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Item 1: Cover Page

Part 2B of Form ADV: **Brochure Supplement**

March 2022

Bradley Griffiths

Firm Contact: Bradley Griffiths, Chief Compliance Officer

This brochure supplement provides information about Bradley Griffiths that supplements our brochure. You should have received a copy of that brochure. Please contact Mr. Griffiths if you did not receive Chatterton & Associate's brochure or if you have any questions about the contents of this supplement.

Additional information about Bradley Griffiths is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2. Educational Background and Business Experience

Bradley Griffiths, APMA® CPFA® CFCS® AIF®, MBA

Year of Birth: 1982

Formal Education after high school:

2021 - Quantic School of Business & Technology, Washington, DC - Master of Business Administration

2017 – Biola University, La Mirada, California – Master of Arts, Education

2006 – Biola University, La Mirada, California – Bachelor of Science, Biochemistry

Professional Licenses and Exams:

2021 – Series 53 Municipal Securities Principal Examination

2018 – Series 24 General Securities Principal Examination

2015 – Series 66 Uniform Combined State Law Examination

2015 – Series 7 General Securities Representative Examination

Business Background:

2020 - Present: Chatterton & Associates, Investment Advisor Representative/Chief Compliance Officer

2020 – Present: Royal Alliance Associates, Registered Representative

2014 - Present: Hedgehog & Owl, Owner

2019 – 2020: KCS Wealth Advisory LLC., Director of Operations

2016 – 2019: Tax and Financial Group, Director of Investment Services

2016 – 2019: Securian Financial Services Inc., Registered Representative

2015 – 2016: Edward Jones, Financial Advisor, Registered Representative

2014 – 2015: RighTurn Inc., Compliance & Accounting Manager

2015: Strategically Connected, Marketing Consultant

2001 – 2014: Biola University, Master Instructor

Accredited Portfolio Management Advisor® (APMA®)

Administered by The College for Financial Planning, individuals who hold the APMA® designation have completed a course of study encompassing client assessment and suitability, risk/return, investment objectives, bond and equity portfolios, modern portfolio theory and investor psychology. Students have hands-on practice in analyzing investment policy statements, building portfolios, and making asset allocation decisions including sell, hold, and buy decisions within a



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client's portfolio. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure.

Certified Financial Crime Specialist® (CFCS®)

The CFCS designation is granted by the Association of Certified Financial Crime Specialists. The certification responds to the need for professionals with a broader, more unified understanding of financial crime that is not limited to one specific area, like fraud, money laundering or corruption. Increasingly, financial institutions, government agencies and other organizations are moving away from a "siloed" approach and seeking to leverage shared tools, techniques and expertise between different financial crime disciplines. The CFCS credential helps verify knowledge and skill across the financial crime spectrum and prepare professionals for this emerging best practice.

The CFCS credential covers 12 key topics, providing validation of knowledge and skill across the financial crime spectrum. This broad-based approach enables CFCS-certified individuals to confront the full range of financial crime risks, promotes flexibility in career paths, and assists organizations with confronting emerging threats.

In order to become a designee, candidates must submit two professional references and document completing at least 40 credits related to financial crime. These credits are met with professional experience, financial crime training, and verified higher education. Once these initial criteria are met, the prospective designee must pass a proctored comprehensive exam. In order to maintain the designation, designees must complete 60 continuing education credits annually.

Certified Plan Fiduciary Advisor® (CPFA®)

The CPFA designation is awarded by the National Association of Plan Advisors (NAPA) to financial advisors who meet high standards of education, experience and integrity. The Certified Plan Fiduciary Advisor credential was developed by some of the nation's leading advisors and retirement plan experts and demonstrates a knowledge, expertise and commitment to working with retirement plans. Plan advisor who earn their CPFA demonstrate the expertise required to

act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities. The comprehensive CPFA examination covers a wide range of subject matter: ERISA Fiduciary Roles and Responsibilities, ERISA Fiduciary Oversight, ERISA Plan Investment Management, and ERISA Plan Management. In addition, designees must agree to devote a minimum of twenty (20) hours, including two (2) CE credits on ethics/professionalism topics, per year to continuing professional education in the field of personal finance and professional practice management.

Accredited Investment Fiduciary® (AIF®)

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company. The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a proctored comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards. In order to maintain their designation, AIF® designees must complete six hours of continuing education annually and satisfy the code of ethics and conducts standards.

Item 3. Disciplinary Information

If there are legal or disciplinary events material to your evaluation of Mr. Griffiths, we are required to disclose all material facts regarding those events.¹

We have nothing to disclose in this regard.

Item 4. Other Business Activities

¹ Note: Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Griffiths to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Griffiths to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.



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- A. If Mr. Griffiths is actively engaged in any investment-related business or occupation, including if he is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.
 - 1. <u>If a relationship between the advisory business and Mr. Griffiths' other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.</u>

We have nothing to disclose in this regard.

2. If Mr. Griffiths receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation he receives. We must explain that this practice gives Mr. Griffiths an incentive to recommend investment products based on the compensation received, rather than on your needs.

Mr. Griffiths is a registered representative of Royal Alliance Associates, Inc., member FINRA/SIPC. He may offer securities and receive normal and customary commissions as a result of securities transactions. This presents a conflict of interest to the extent that Mr. Griffiths recommends that a client invest in a security which results in a commission being paid to him.

A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products incentive to recommend products based on the compensation adviser and/or our supervised persons may earn and may not necessarily be in the best interests of the client. In order to minimize this conflict of interest, our firm will place client interests ahead of its own interests and adhere to our firm's Code of Ethics as well as clearly explaining this conflict when recommending any such products to clients. Clients are not obligated to purchase these products.

B. <u>If Mr. Griffiths is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide</u>



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a substantial source of his income or involve a substantial amount of his time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Mr. Griffiths' time and income, we may presume that they are not substantial.

Bradley Griffiths is co-owner of Hedgehog & Owl, an online retail business. This business activity represents less than 1% of his time.

Item 5. Additional Compensation

If someone who is not a client provides an economic benefit to Mr. Griffiths for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include his regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

Item 6. Supervision

We are required to explain how we supervise Mr. Griffiths, including how we monitor the advice he provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Mr. Griffiths' advisory activities on behalf of our firm.

Robert Chatterton, Chief Executive Officer of Chatterton & Associates, the Wealth Management Team, Inc., supervises Mr. Griffiths' activities through review of written correspondence including emails, account suitability, and personal securities transactions among other activities. Please contact Mr. Chatterton if you have any questions about Mr. Griffiths' brochure supplement at (714) 572-2050.