

Client Relationship Summary [Form CRS]

February 2021

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. This document provides a summary of the types of services we provide and how you will pay for them. Please feel free to reach out to us for additional information. Questions you might consider asking us are noted (→) throughout this Summary.

Introduction

Bradley & Company Private Wealth Management is an SEC registered investment adviser that has provided investment management services to retail investors since 2007. We do not provide services as a broker-dealer. There are differences between investment advisers and broker-dealers, and it is important for you to understand them as you decide what kind of account is right for you. You can learn more about the differences between investment advisers and broker-dealers at the websites provided by the SEC like <https://www.investor.gov> and <https://www.investor.gov/crs>.

What Investment Services and Advice Can You Provide Me?

Investment Management Services: If you engage us for investment management services, we will:

	Tailor an investment approach for you that reflects your age, income, family circumstances, financial condition, retirement goals, investment goals, and your risk tolerance.
	Conduct periodic reviews of your goals and asset allocation in response to changes in the above factors.
	Provide ongoing monitoring of your investment accounts.
	Monitor market, economic, and geo-political trends.
	Review relevant financial industry research on a routine basis.
	Buy and sell securities for your accounts that are consistent with your financial goals and risk tolerance.
	We will do so on a “discretionary” basis that authorizes us to trade without your approval of each trade.

Our Firm imposes a minimum management fee of \$10,000.

Financial Planning Services: If you engage us for financial planning services, depending upon your needs, we will evaluate your financial condition and help you set financial goals and plan for retirement and other objectives. Analyses may include education funding, insurance needs, charitable giving, estate and tax planning and employer stock options. These may be stand-alone services or included with our management services.

Additional detail about our services is provided in our Form ADV Part 2A at Item 4.

Questions you may want to ask any financial professional:

- ➔ Given my financial situation, should I choose an investment advisory service and why or why not?
- ➔ How will you choose investments to recommend to me?
- ➔ What is your relevant experience, including your licenses, education and other qualifications?
- ➔ What do your professional qualifications mean?

What Fees Will I Pay?

These are the principal types of fees you will pay to us in connection with our services:

 <p>Asset-Based Fees</p>	<p>Quarterly management fees charged as a % of the value of assets under management.</p>
 <p>Fixed Fees</p>	<p>Financial planning fees on a fixed fee basis are paid at the time the services are provided.</p>
 <p>Hourly Fees</p>	<p>Financial planning fees on an hourly fee basis are paid at the time the services are provided.</p>

We have negotiated fees with certain clients. Some clients may pay a different fee for our services or pay no fee at all. *All fees are non-refundable.*

Other fees & costs you will pay to others in relation to your investments include:

 <p>Custodian fees</p>	<p>If charged, these are paid to your custodian directly, on an annual or a monthly basis.</p>
 <p>Maintenance fees</p>	<p>If charged, these are paid to your custodian directly.</p>
 <p>Transactional and product-level fees (commissions)</p>	<p>If charged, these are paid to your executing broker-dealer directly, at the time of each transaction.</p>
 <p>Fees related to Funds and Annuities</p>	<p>Mutual funds, exchange traded funds (ETFs), hedge funds, and variable annuity products may impose ongoing management fees, administrative fees and redemption or surrender fees. These are paid to the issuer of the fund or ETF or the insurer that issues the annuity directly.</p>

The fee any investment adviser charges reduces the value of your account when it is deducted each billing period. Please make sure you understand what fees and costs you are paying. You will pay the asset-based fee each period even if no securities are bought or sold in your account. You will pay fees and costs whether you make or lose money on your investments. More detail about our fees is in our Form ADV Part 2A, Item 5.

- ➔ Help me understand how fees and costs might affect my investments – If I give you \$10,000 to invest, how much will go to fees and costs, and how much will remain in investment positions?

What Are Your Legal Obligations to Me When Acting as My Investment Adviser?

We have adopted an internal Code of Ethics. When we act as your investment adviser, we must act in your best interest and not put our interests ahead of yours. Where the interests of our Firm or staff conflict with our duties to you, we must work to eliminate the conflict or inform you of it in clear terms. You should understand these conflicts because they can affect the investment advice we provide you.

How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

Here are examples to help you understand what this means:

- We charge fees for our services and that creates a conflict with your interests. The more assets there are in your investment account, the more absolute dollars you pay to us in fees, so we have an incentive to encourage you to increase the assets in your account. This may manifest by our recommending you invest in securities rather than annuities, real estate, or other non-managed assets or that you rollover a 401K retirement account to an IRA account managed by our Firm.
- We advise you to custody your investment accounts with Fidelity Investments (National Financial Services) because it provides us with essential trading, reporting, compliance, education and back office services and investment research.
- We have incentives to refer you to First Republic Bank, US Bank or Chase because we have most of our experience with those banking institutions.
- Our employees personally invest in the same, or different securities based upon their personal financial situations and their investments may perform as well as, better or worse than our clients' investments.

How Do Your Financial Professionals Make Money?

Our financial professionals are paid a salary based upon their education, professional training, work background and the level of skill, sophistication and dedication they exhibit in conducting their work for the Firm. Professionals who are owners of the business share in the profits of the business. Non-owner financial professionals receive salaries and are entitled to participate in the Firm's bonus program in years in which bonuses are awarded.

→ How might your conflicts of interest affect me, and how will you address them?

Do You or Your Financial Professionals Have Legal or Disciplinary Histories?

No. We recommend that you visit <https://www.adviserinfo.sec.gov/> for a free and simple search tool to research our Firm and our financial professionals.

- As a financial professional, do you have any disciplinary history? For which type of conduct?
- Who is my primary contact person?
- Is she or he an Investment Adviser Representative or a Broker-Dealer Representative?
- Who can I speak with if I have concerns about how this person is treating me?

We encourage you to seek additional information.

Visit <https://www.investor.gov/> that provides helpful educational materials to learn more about investing. For additional information on our advisory services, fees, conflicts and personnel, see our Form ADV Parts 1 and 2 on <https://www.adviserinfo.sec.gov/>. If you have any concerns or questions, or to obtain copies of our Form ADV Part 2 or Form CRS, contact Michael D. Bradley at 415-655-5500.