

Coombe, Bender & Company LLC (CBC) is a Registered Investment Advisor registered with the Securities and Exchange Commission. The services and fees of Registered Investment Advisors differ from those of a broker-dealer firm, and it is important for clients to understand the differences between them. For your reference, free and simple tools are available to research firms and financial professionals. Please visit www.investor.gov/crs for this information and education materials about broker-dealers, investment advisors and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Coombe, Bender and Company provides ongoing financial advice and management of portfolios to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations or other business entities. The types of advisory services and features include:

Customized Portfolio Management: CBC manages client accounts on either a discretionary or non-discretionary basis, guided by the objectives and personal investment goals of each client. Accounts are monitored continuously throughout each quarter and recommendations and commentary are provided quarterly. Minimum account (or combination of accounts) is \$250,000, but negotiable.

Model Portfolio Management: CBC provides portfolio management services to clients using five proprietary model asset allocation portfolios designed to meet a particular investment objective: conservative income, income, conservative growth, growth, and aggressive growth. Model portfolios are managed on a discretionary basis. Accounts are monitored continuously throughout each quarter. Minimum account (or combination of accounts) is \$250,000.

Financial Planning: CBC also provides advice in the form of financial planning. Clients engaging this service receive a detailed financial plan designed to achieve their stated financial goals and objectives. In general, the financial plan will address the following areas as necessary: retirement, investments, taxes and cash flow, estate planning and education.

401(k) Consulting Services for Plan Sponsors:

CBC provides advisory services for plan sponsors, assisting plan sponsors in the decisions required for establishing/updating a 401(k) defined contribution plan.

Additional information regarding services offered may be found in Form ADV Part II section 4, which is posted on our website and on the Investment Advisor Public Disclosure website <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

YOU ARE ENCOURAGED TO ASK A FINANCIAL PROFESSIONAL THE FOLLOWING:

*Given my financial situation, should I choose an investment advisory service? 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 these qualifications mean?*

WHAT FEES WILL I PAY?

Fees for Portfolio Management:

- The specific way fees are charged by CBC is established in a client's written advisory agreement.
- Fees for Customized Portfolio Management and Model Portfolio management are calculated as a percentage of assets under management or advisement, based on the account balance at the end of each calendar quarter, and debited directly from the account. Fee is prorated for deposits made during the quarter. An itemized invoice is included with each quarterly statement.
- The nature of this compensation arrangement creates a conflict of interest in that, the advisor's fee will increase or decrease with account balance, and therefore creates an incentive for the advisor to recommend increasing or adding to the account balance over time.
- CBC management fees also do not include wire fees, margin interest, overnight or registered postage charges, IRA custodial fees or transaction charges. Transaction charges for purchase or sales of some securities may range from \$0-\$28. These fees are charged to the client directly by the mutual fund, custodian or financial institution when incurred.

- You will pay fees whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please refer to our Form ADV Part II, section 5 for more information.

Fees for Financial Planning Services: CBC will generally charge for financial planning services on an hourly basis, ranging from \$150-\$300 per hour, depending on the nature and complexity of each client's circumstances. If a Financial Planning/ Consulting Services client implements the investment recommendation by engaging CBC for portfolio management services, CBC may, at its discretion, waive, discount, or adjust the client's Financial Planning or Consulting Services fee.

Help me understand how these 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 be invested for me?

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we act as your investment advisor, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means:

- Management personnel of our firm, in their individual capacities, are agents for various insurance companies. As such, these individuals can receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients.
- If we recommend that a client roll over retirement plan assets into an account managed by CBC, such a recommendation creates a conflict of interest because CBC will earn an advisory fee on the new assets. Clients are under no obligation to rollover retirement assets to be managed by CBC.
- The greater the balance of your advisory account, the more you may pay in fees, and our firm may therefore have an incentive to encourage you to increase the balance of your account(s).

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

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

The advisors and staff of CBC are compensated by salary. Compensation is determined annually based on company earnings, which are derived from portfolio management and financial planning services. Financial professional compensation is not determined by the size of accounts, transactions, types of securities purchased, commissions or time spent on individual client accounts.

DO YOU OR YOUR PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Information about our firm and advisors may be found at www.investor.gov/crs, a free and simple search tool.

AS A FINANCIAL PROFESSIONAL, DO YOU HAVE ANY DISCIPLINARY HISTORY? FOR WHAT TYPE OF CONDUCT?

You may find additional information about our firm and financial professionals, as well as request an up-to-date copy of our form Client Relationship Summary at www.coombebender.com, or by calling 845-647-4800.

Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?