

Form ADV, Part 2A: Firm Brochure

- This brochure provides information about the qualifications and business practices of Gladwyn Financial Advisors, Inc. If you have any questions about the contents of this brochure, please contact Timothy T. Murray, CFP®, CDFA® at TimMurray@GladwynFinancial.com or at the phone number below. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.
- Additional information about Gladwyn Financial Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.
- Being a "Registered Investment Advisor" (RIA) or being described as "registered," does not imply a certain level of skill or training.

Item 1 - Identification

Gladwyn Financial Advisors, Inc.

13603 Gladwyn Ct., Chantilly, VA 20151
Phone: 703-810-8424 Fax: 703-991-5519
Email: TimMurray@GladwynFinancial.com
Website: www.GladwynFinancial.com
Date of this brochure: January 14, 2024

Item 2 – Material Changes

Gladwyn Financial Advisors, Inc (hereinafter "Gladwyn") is required to file an amended update of this Form ADV Firm Brochure annually with the Virginia State Corporation Commission. Gladwyn will provide a new copy of this Firm Brochure as necessary based on changes or new information, at any time, without charge.

Material changes since the last update March 2023:

Item 4 – Advisory Business, Section A – Description of the Advisory Firm:

Scott H. Barnard has been removed as an Advisor.

Currently, this Firm Brochure may be requested by contacting Timothy T. Murray, CFP®, CDFA® at 703-810-8424 or TimMurray@GladwynFinancial.com. This brochure is also available on the web at www.GladwynFinancial.com. Additional information about Gladwyn Financial Advisors, Inc. is available via the SEC's web site www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated, registered, or are required to be registered as investment advisor representatives of Gladwyn Financial Advisors, Inc.

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Item 4 - Advisory Business

A. Description of the Advisory Firm

Gladwyn Financial Advisors, Inc. (Gladwyn) is a corporation formed under the laws of the Commonwealth of Virginia. It has operated as a Registered Investment Advisory (RIA) firm since June 2005. The principal owners of Gladwyn are Timothy T. Murray, CFP®, CDFA® and his wife, Polly A. Murray.

Financial planning and investment advice is provided by:

Timothy T. Murray, CFP®, CDFA®

Designations: Certified Financial PlannerTM

Certified Divorce Financial Analyst®

Licenses: Series 66 – Registered Investment Advisor Representative

Year of Birth: 1963

Formal Education after High School:

Virginia Tech, B.S., Civil Engineering

George Mason University, M.Ed., Education

Florida State University, Financial Planning Certificate

Business Background for the Past 15 Years:

- Gladwyn Financial Advisors, Inc., Registered Investment Advisor Representative & Chief Compliance Officer, 06/2005 to Present
- Gladwyn Financial Advisors, Inc., President/Owner, 01/2002 to Present
- Capital Planning & Investments, Registered Investment Advisor Representative, 01/2002 to 05/2005
- Jefferson Pilot Securities Corporation, Registered Representative, 01/2002 to 05/2005
- P.M. Learning Centers, Inc., Vice President/Owner, 03/1993 to 01/2002

CERTIFIED FINANCIAL PLANNERTM (CFP®) Designation Explanation Statement

To be authorized to use the CFP® designation, a candidate must satisfactorily fulfill educational, testing, experience, and ethical requirements. The CFP® candidate must complete college level course work covering the following planning areas: risk management, employee benefits, investments, income taxes, retirement, and estate tax issues. The CFP® candidate must complete at least 3 years of full-time financial planning related experience, and once awarded the designation, must abide by a stringent code of conduct and standards of practice and complete 30 hours of continuing education, including completion of a 2-hour, CFP® Board-approved ethics continuing education course, every two years.

Certified Divorce Financial Analyst® (CDFA®) Designation Explanation Statement To be authorized to use the CDFA® designation, a candidate must satisfactorily fulfill educational, examination, and experience requirements. The examination tests understanding and knowledge of the financial aspects of divorce. In addition, the

candidate must demonstrate the practical application of this knowledge in the divorce process. Once certified, CDFA® practitioners are required to maintain technical competence, fulfill ethical obligations, and complete, over a two-year period, a minimum of 30 hours of divorce-related continuing education.

B. Financial Planning and Consulting Services

Gladwyn Financial Advisors, Inc. (Gladwyn) provides financial planning services which typically involve providing a variety of services to clients, principally advisory in nature, regarding the management of their financial resources. Gladwyn will first conduct an initial consultation with the client during which pertinent information about the client's financial circumstances and objectives is collected. Once such information has been reviewed and analyzed, a written financial plan—designed to achieve the clients' stated financial goals and objectives—will be produced and presented to the client. The primary objective of this process is to allow Gladwyn to assist the client in developing a strategy for the successful management of income, assets, and liabilities while meeting the client's financial goals and objectives.

Some clients may only require advice on a single aspect of the management of their financial resources. For these clients, Gladwyn offers financial plans in a modular format and/or general consulting services that address only those specific areas of concern. These areas may include, but are not limited to, cash flow management, investment planning, retirement planning, insurance and risk management, college education planning, debt counseling, advice on existing or potential investment products, asset allocation, and/or financial decision making/negotiation.

Gladwyn develops financial plans based on the client's current financial situation. They are based on financial information provided by the client. Clients are advised that certain assumptions may be made with respect to interest and inflation rates as well as the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. Gladwyn cannot offer any guarantees or promises that the client's financial goals and objectives will be met. If ongoing financial planning services are requested, it is the client's responsibility to promptly notify Gladwyn if their financial situation, goals, objectives, or needs change.

C. Investment Advisory Services

Gladwyn provides discretionary or non-discretionary portfolio management services where investment advice is custom tailored to meet the needs and investment objectives of the client. Gladwyn uses a client completed investment questionnaire along with advisor consultations to determine the appropriate asset allocation. An Investment Policy Summary (IPS) details the specific recommended investments. Once the IPS is approved by the client, initial trades are made. Gladwyn then regularly monitors client portfolios and provides change recommendations as warranted. It is the

client's responsibility to promptly notify Gladwyn if their financial situation, goals, objectives, or needs change.

Gladwyn has discretion over Client accounts to execute previously approved trades or if a trade is required in order to make funds available for advisory fees as described in the Gladwyn Financial Advisors Engagement Agreement.

Gladwyn investment selections primarily consist of index-based exchange traded funds (ETFs), and mutual funds. Occasionally, individual equities and bonds may be held in Gladwyn client portfolios.

Approximate Assets Under Management (as January 14, 2024):

Non-Discretionary: \$ 14 million Discretionary: \$108 million

Item 5 – Fees and Compensation

A. Financial Planning and Consulting Services

Gladwyn charges an hourly rate of \$250 for financial planning and consulting services. An estimate of the total time/cost will be determined at the start of the advisory relationship. An initial payment of 50% of the estimated time/cost may be required at the start of the advisory relationship and the balance will be due upon completion of the contracted services. The final fee shall be determined based on the facts and circumstances of the client's financial situation and the complexity of the financial plan or service(s) requested. *In limited circumstances*, the time/cost could potentially exceed the initial estimate. In such cases Gladwyn will notify the client and may request that the client pay an additional fee.

The client may terminate the financial planning and/or consulting agreement within five business days of the date of acceptance without penalty to the client. After the five business day period, either party may terminate the agreement by providing written notice to the other party. However, the client will incur a pro rata charge for bona fide financial planning and/or consulting services rendered prior to such termination. In the event there are any prepaid, unearned fees, Gladwyn will promptly refund a pro rata share to the client.

B. Portfolio Management Services

The annual fee for portfolio management services is billed quarterly in arrears based on the market value of the managed accounts on the last day of the quarter. Fees are assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a billing period. Gladwyn's fees for portfolio management services, subject to negotiation, are based on the following tiered fee schedule:

Assets Under Management	Quarterly Fee	Annualized Fee
\$0 to \$50,000	0.5000%	2.00%
\$50,001 to \$100,000	0.3750%	1.50%
\$100,001 to \$500,000	0.3125%	1.25%
\$500,001 to \$1,000,000	0.2500%	1.00%
\$1,000,001 to \$1,250,000	0.2250%	0.90%
\$1,250,001 to \$2,500,000	0.2000%	0.80%
\$2,500,001 to \$5,000,000	0.1750%	0.70%
\$5,000,001 to \$7,500,000	0.1500%	0.60%
\$7,500,001 to \$10,000,000	0.1250%	0.50%
\$10,000,001 and higher	0.1000%	0.40%

Payment of fees will be made by the custodian holding the client's securities provided that the following requirements are met:

- The client provides written authorization permitting the fees to be paid directly from the client's account held by the custodian (i.e., Fidelity Investments). Gladwyn does not have access to client funds for payment of fees without client consent in writing.
- Gladwyn sends the client an invoice showing the amount of the fee, the value of the client's assets on which the fee is based, and the specific manner in which the fee was calculated.
- The custodian agrees to send the client a statement, at least quarterly, indicating all amounts dispersed from the account including the amount of the advisory fee paid directly to Gladwyn.

Gladwyn fees are exclusive of brokerage transaction fees, and other related costs or expenses. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees which are disclosed in a fund's prospectus. Such charges and fees are exclusive of and in addition to Gladwyn's fee. **Gladwyn shall not receive any portion of custodian charges or other third party fees.**

Gladwyn retains the discretion to negotiate fees on a client-by-client basis. Client facts, circumstances, and needs will be considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, and account composition, among other factors. Discounts, not generally available to our advisory clients, may be

offered to family members and friends of associated persons of our firm. We may group certain related accounts for the purpose of determining the annualized fee. The specific annual fee schedule is identified in the signed Engagement Agreement made between the advisor and each client.

Gladwyn or client may terminate the management agreement within five business days of the date of acceptance without penalty to the client. After the five business day period, either party, upon 30 days written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the quarter in which the cancellation notice was given and fees will be due and payable by the client. Refunds are not applicable as fees are paid in arrears.

Item 6 - Performance-Based Fees and Side-By-Side Management

Gladwyn does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) nor participate in side-by-side management of assets. Side-by-side management is a situation where an advisor is managing multiple accounts with differing fee structures which may lead to a conflict of interest where one account is favored over another.

Item 7 - Types of Clients

Gladwyn offers personalized financial planning and investment advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

Gladwyn has no minimum account size nor minimum client net worth policies.

Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss

Gladwyn ascertains investor's goals, risk tolerance, and time horizon through an interview process. These findings, along with an investment questionnaire, are used to determine investment strategies or financial plans that are, according to the Advisor's judgment, best suited to fit the client's needs. In providing its financial planning and investment advisory services, Gladwyn generally focuses on the long-term. After Gladwyn evaluates the client's financial needs, the Advisor designs investment and risk management strategies to help the client achieve his or her financial goals.

Gladwyn investment recommendations reflect certain principles and considerations. All investment accounts are analyzed as a single aggregated portfolio. Recommendations

are then made to allocate the portfolio across multiple diverse asset classes. Tax efficiency is important but is not the sole consideration in developing a strategy. Finally, close attention is paid to investment expenses and numerous other factors related to individual investment selection.

Investment strategies may include long-term and short-term security purchases depending upon the individual needs of the client. The concept of asset allocation or spreading investments among numerous asset classes is in the forefront of Gladwyn's investment strategies. Asset allocation seeks to achieve diversification which reduces risk while not sacrificing the portfolio's overall return.

The major asset classes Gladwyn commonly recommends are U.S. Large-Capitalization Stocks (growth & value), U.S. Mid-Capitalization Stocks (growth & value), U.S. Small-Capitalization Stocks (growth & value), Non-U.S. Stocks, Emerging Market Stocks, Commodities, Short, Intermediate, and Long-term Corporate and Government Bonds, Non-US and Emerging Markets Corporate and Government Bonds, High Yield Bonds, Cash and Cash equivalents. Gladwyn generally does not recommend specific individual securities or specific sectors within asset classes as exposure to these sectors is provided by the recommended funds.

Gladwyn does not attempt to "time the market" or make specific, short-term predictions in market directions. As opposed to "timing the market", Gladwyn believes that a better strategy is "time in the market".

Gladwyn generally recommends no-load (or load waived) mutual and exchange-traded funds (ETF's) that represent either an index or managed portfolio of individual securities diversified within the target asset class. Analyzed criteria include: expense ratio, performance, style, tenure, market capitalization, turnover ratio, and date of inception.

Recommendations for purchasing investments will be based on publicly available reports and analysis. Gladwyn utilizes many sources of public information and research materials.

Although clients may re-engage services at any time, Gladwyn encourages the strategy of regular portfolio rebalancing on a quarterly basis. Periodic rebalancing is a disciplined way to, over time, buy (relatively) low and sell (relatively) high while maintaining the portfolio's allocation target values. Depending on the client's individual circumstances, Gladwyn may encourage more frequent portfolio reviews or analysis. It is the client's responsibility to notify Gladwyn of changes in their long-term goals or if there are significant financial circumstances that need to be addressed.

In summary, Gladwyn's investment strategies are based on Six Principles and Practices:

Principles

- 1. **Faith** that the United States and, in aggregate, world economies will continue to grow and outpace inflation as they always have—long-term.
- 2. **Patience** in the approach and management of long-term investments. Proven investment strategies need sufficient time to work.
- 3. **Discipline** to consistently adhere to and fully embrace the current investment plan, regardless of market conditions. Action taken will be based on a set plan as opposed to a reaction to market movement or current events.

Practices

- Asset allocation establishes a stock/commodity/bond & cash ratio that is appropriate for the investor's risk tolerance—which then helps reduce the likelihood of panic selling at market lows.
- 2. **Diversification** spreads risk among numerous asset classes so that a single category or security's decline will not, in a significant way, adversely affect the overall performance of the portfolio.
- 3. **Rebalancing** takes advantage of market volatility by reducing the holdings of investment categories that have outperformed others (selling high) and using those proceeds to purchase investment categories that have underperformed (buying low).

Investing in stocks and bonds, individually and/or through funds, involves risk of loss of principle. Gladwyn clients are advised to read their investment policy summary and fund prospectuses carefully and ask for further explanation of investment strategies, if needed, before agreeing to implement the investment plan.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of Gladwyn or the integrity of Gladwyn's management.

Gladwyn has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

No Gladwyn employees are registered, or have an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Gladwyn does not have any related parties, and as a result, does not have a relationship with any related parties.

For investment advisory and financial planning clients, Gladwyn receives compensation directly from said clients and does not receive any remuneration from outside sources or have any conflicts of interest with any third party.

In addition to investment advisory and financial planning services, Timothy T. Murray, CFP®, CDFA® offers income tax preparation and divorce financial analysis services through Gladwyn. Investment advisory and/or financial planning clients of Gladwyn may choose to utilize these additional services. Clients are advised that fees paid to Gladwyn for investment advisory and financial planning services are distinct and separate from fees paid for the above mentioned services. Timothy T. Murray spends approximately 5% of their professional time acting in separate capacities that involve tax preparation and divorce financial analysis.

As a fiduciary, Gladwyn Financial Advisors, Inc. has certain legal obligations, including the obligation to act in clients' best interest. Gladwyn Financial Advisors, Inc. maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Gladwyn Financial Advisors, Inc. has entered into a succession agreement with Buckingham Strategic Wealth, LLC, effective April 8, 2022. Gladwyn Financial Advisors, Inc. can provide additional information to any current or prospective client upon request to Timothy T. Murray, CFP®, CDFA®, President at (703) 810-8424 or TimMurray@GladwynFinancial.com

Item 11 - Code of Ethics

Gladwyn has adopted a Code of Ethics, the full text of which is available upon request. Gladwyn desires to comply with all applicable laws and regulations governing its practice and believes that compliance with such regulations is a signal to its clients that Gladwyn exists to serve them. Gladwyn supports the efforts of those organizations dedicated to upholding the law.

Gladwyn has also set forth guidelines for professional standards under which all associated persons of Gladwyn are to conduct themselves with the intention of protecting client's interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith, and fair dealing. All associated persons are expected to strictly adhere to these guidelines as well as the procedures for approval and reporting established in the Code of Ethics.

Gladwyn does not recommend that clients buy or sell any security in which a related person to Gladwyn has a material financial interest.

Advisors of Gladwyn do, however, regularly own, buy, and sell mutual and exchange traded funds for themselves that they also recommend to clients.

Privacy Policies

Protecting client privacy is of high importance. Gladwyn views protecting its clients' private information as a top priority and, pursuant to the requirements of the federal Gramm Leach Bliley Act, Gladwyn has instituted policies and procedures to ensure that client information is kept private and secure.

Gladwyn does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties, except as permitted by law. While servicing a client's account, Gladwyn may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

Gladwyn restricts internal access to client information to those associated persons working with or for Gladwyn who need access to that information to facilitate the delivery of services to the client. Gladwyn has not and will never sell client information.

Item 12 - Brokerage Practices

For brokerage accounts, Gladwyn's clients purchase investments through National Financial Services LLC, a wholly owned subsidiary of Fidelity Investments. For Section 529 College Savings Plans, Gladwyn's clients purchase investments through American Funds. These firms are independent from and unaffiliated with Gladwyn. Fidelity Investments and American Funds offers services to independent investment advisors which include custody of securities, trade execution, clearance, and settlement of transactions.

Not all advisers require clients to use a specific broker-dealer. By utilizing Fidelity Investments and/or American Funds, Gladwyn clients may not receive the most favorable execution of transactions, which may result in a higher cost. Fidelity Investments and/or American Funds may charge a higher transaction fee for a particular type of service than can be obtained from another broker-dealer.

As a matter of policy and practice, Gladwyn does not use client "block trades." Consequently, certain client trades may be executed before others, and at a different price. Additionally, Gladwyn clients may not receive volume discounts available to advisors who block client trades.

The research products and services that Gladwyn may receive from Fidelity Investments and American Funds may include financial publications, information about companies and industries, research software, and other products or services. Such research products and services are provided to all investment advisors who utilize Fidelity Investments or American Funds and are not considered to be paid for with soft dollars.

Item 13 - Review of Accounts

Review of Accounts

Gladwyn will monitor client accounts on a continual basis and will conduct formal reviews with clients quarterly, or more frequently, depending on the scope of the engagement. Triggering factors that stimulate the review of a client's account include, but are not limited to, the following: a deposit or withdrawal of cash, changes in economic conditions, changes in the client's financial situation or investment objectives, and the client's request for an additional review of the account. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

Reports to Clients

Clients will receive statements directly from Fidelity Investments and/or American Funds on a monthly or quarterly basis. Gladwyn will provide quarterly performance reports and billing statements. Additional reports may be provided upon client request.

Item 14 - Client Referrals and Other Compensation

Gladwyn does not receive any economic benefit, directly or indirectly, from any third party, for advice rendered to our clients. Gladwyn also does not provide or receive compensation, from any third party, directly or indirectly, for referrals.

Item 15 - Custody

Gladwyn shall never have custody of any client funds or securities, as the services of a qualified and independent custodian (Fidelity Investments and/or American Funds) will be used for these asset management services. It is recommended, however, that each client regularly review statements provided by said custodian.

Item 16 – Investment Discretion

Gladwyn provides investment advice custom tailored to meet the needs and investment objectives of the client. Investment advisory and portfolio management services are provided on either a discretionary basis, where the advisor independently initiates portfolio changes in line with the client's investment plan, or non-discretionary basis, where all changes to the portfolio are pre-approved by the client.

For discretionary trading, Gladwyn determines the trade amount, type, and broker-dealer. Specific client investment restrictions may limit Gladwyn's ability to manage client portfolios properly, and as such, may impact the performance of the portfolio. Therefore, Gladwyn does not accept client trade limitations.

The signed client engagement agreement indicates whether discretionary or nondiscretionary investment advisory services are to be provided. Any changes regarding discretionary or non-discretionary investment advisory services requires the signing of a new engagement agreement.

Item 17 – Voting Client Securities

Gladwyn does not accept authority or responsibility to vote proxies for client securities even if requested to do so by a client. Clients generally receive proxy material directly from their custodian or transfer agent and may or may not elect to vote proxies. Gladwyn does not offer advice on voting proxies.

Item 18 – Financial Information

Gladwyn does not foresee any financial condition that is reasonably likely to impair the ability to meet contractual commitments to clients. Gladwyn has never been the subject of a bankruptcy petition.

Item 19 - Requirements for State-Registered Advisors

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to previous items in this document as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows this page. Per Item 11 of this brochure, neither Gladwyn nor a member of its management has a material relationship with the issuer of a security.



Gladwyn Financial Advisors, Inc

13603 Gladwyn Ct., Chantilly, VA 20151 Phone: 703-810-8424 Fax: 703-991-5519 Website: www.GladwynFinancial.com

Firm CRD: 135544

Timothy T. Murray, CFP®, CDFA®

Principal/Chief Compliance Officer Investment Advisor Representative Individual CRD#: 4419210

Form ADV Part 2B Brochure Supplement January 14, 2024

Item 1 - Cover Page

This brochure provides information about Timothy T. Murray that supplements Gladwyn Financial Advisors, Inc Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact Mr. Murray at (703) 810-8424 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about Timothy T. Murray is available on the Securities and Exchange Commission's (SEC) website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Regulatory guidance requires Gladwyn to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience.

Principal Executive Officers and Management Persons

Principal/Chief Compliance Officer/Registered Investment Advisor Representative

Timothy T. Murray, CFP®, CDFA®

Year of Birth: 1963 CRD Number: 4419210

Educational Background and Business Experience

Designations: Certified Financial PlannerTM

Certified Divorce Financial Analyst®

Licenses: Series 66 - Registered Investment Advisor Representative

Formal Education after High School:

- Virginia Tech, B.S., Civil Engineering
- George Mason University, M.Ed., Education
- Florida State University, Financial Planning Certificate

Business Background for the Past 15 Years:

- Gladwyn Financial Advisors, Inc., Registered Investment Advisor Representative, 06/2005 to Present
- Gladwyn Financial Advisors, Inc., President/Owner, 01/2002 to Present
- Capital Planning & Investments, Registered Investment Advisor Representative, 01/2002 to 05/2005
- Jefferson Pilot Securities Corporation, Registered Representative, 01/2002 to 05/2005
- P.M. Learning Centers, Inc., Vice President/Owner, 03/1993 to 01/2002

<u>Descriptions of Professional Designations</u>

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States

and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.

- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP® Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP®

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every two
 years, including two hours on the Code of Ethics and other parts of the Standards of
 Professional Conduct, to maintain competence and keep up with developments in the
 financial planning field; and
- Ethics Renew an agreement to be bound by the Standards of Professional Conduct.
 The Standards prominently require that CFP® professionals provide financial planning
 services at a fiduciary standard of care. This means CFP® professionals must provide
 financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Divorce Financial Analyst® (CDFA®) Designation Explanation Statement:

To be authorized to use the CDFA® designation, a candidate must satisfactorily fulfill educational, examination, and experience requirements. The examination tests understanding and knowledge of the financial aspects of divorce. In addition, the candidate must demonstrate the practical application of this knowledge in the divorce process. Once certified, CDFA® practitioners are required to maintain technical competence, fulfill ethical obligations, and complete, over a two-year period, a minimum of 30 hours of divorce-related continuing education.

Item 3 - Disciplinary Information

Registered Investment Advisor firms (RIAs) are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules material to your evaluation of each officer or a supervised person providing investment advice.

Timothy T. Murray has not been the subject of such a material event.

Item 4 - Other Business Activities

Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.

In addition to investment advisory and financial planning services, Timothy T. Murray, CFP®, CDFA® offers income tax preparation and divorce financial analysis services through Gladwyn. Investment advisory and/or financial planning clients of Gladwyn may choose to utilize these additional services. Clients are advised that fees paid to Gladwyn for investment advisory and financial planning services are distinct and separate from fees paid for the above-mentioned services. Timothy T. Murray currently spends approximately 5% of their professional time acting in separate capacities that involve tax preparation and divorce financial analysis.

Timothy T. Murray does not have a material relationship with the issuer of a security. They are not registered, nor do they have an application pending to register as a registered representative of a broker-dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. They do not receive commissions, bonuses, or other compensation based on the sale of securities, including that as a registered representative of a broker-dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Item 5 - Additional Compensation

Neither Gladwyn Financial Advisors, Inc. nor Timothy T. Murray is compensated for advisory services involving performance-based fees. Firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to clients.

Item 6 - Supervision

Timothy T. Murray serves as the firm's Chief Compliance Officer. Because supervising one's

self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict. Questions relating to Gladwyn Financial Advisors, Inc, its services, or this Form ADV Part 2 may be made to the attention of Mr. Murray at (703) 810-8424.

Additional information about Gladwyn, other advisory firms, or associated investment advisor representatives is available at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The CRD number for Gladwyn Financial Advisors, Inc is 135544. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling Virginia Division of Securities & Retail Franchising at (800) 552-7945 or the securities commission in the state where the client resides.

Item 7 - Requirements for State-Registered Advisers

There have been no awards, sanctions, or other matters where Gladwyn Financial Advisors Inc. or Timothy T. Murray, have been found liable in an arbitration, self-regulatory, or administrative proceedings. Timothy T. Murray has not been the subject of a bankruptcy petition.

Gladwyn Financial Advisors, Inc.

Client Information Privacy Principles

The safeguarding of client information is taken seriously at Gladwyn Financial Advisors, Inc (Gladwyn). To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles.

- 1. **Recognition of a Client's Expectation of Privacy**: At Gladwyn, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our client's trust. Thus, the safekeeping of client information is a priority for Gladwyn.
- 2. Use, Collection, and Retention of Client Information: Gladwyn limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to the following: name, address, telephone number, tax identification number, date of birth, employment status, annual income, and net worth. Gladwyn may, unless requested in writing to the contrary, provide information to accountants, attorneys, or other professionals working with current Gladwyn clients.
- 3. **Maintenance of Accurate Information**: Gladwyn recognizes that it must maintain accurate client records. Therefore, Gladwyn has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information: At Gladwyn, employee access to personally identifiable client information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Gladwyn employees are responsible for maintaining the confidentiality of client information and employees who violate these Privacy Principles will be subject to disciplinary measures.
- 5. **Protection of Information via Established Security Procedures:** Gladwyn recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, Gladwyn has established appropriate security standards and procedures to guard against any unauthorized access to client information.
- 6. **Disclosure of Privacy Principles to Clients:** Gladwyn recognizes and respects the privacy expectations of our clients and want them to understand our commitment to privacy in our use of client information. As a result of this commitment, we have produced this Privacy Principles document which is delivered via email along with the annually updated Form ADV, Part 2A. Simultaneously, Form ADV, Part 2a and the Privacy Principles are uploaded to each client's secure web portal. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should contact Timothy T. Murray, CFP®, CDFA® at 703-810-8424 or e-mail him at TimMurray@GladwynFinancial.com.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients.