

# BRINDLE & BAY

## FINANCIAL ADVISORS

### FORM ADV PART 3 FORM CRS – CUSTOMER RELATIONSHIP SUMMARY MARCH 23, 2026

#### Item 1 – Introduction

Brindle & Bay Financial Advisors is a registered investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. *Free and simple tools are available to research firms and financial professionals at [investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.*

#### Item 2 – Relationships and Services

##### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We provide investment advisory services to retail investors. We offer financial planning and investment management services to individuals and high net worth individuals. We require a minimum account size of \$1,000,000 per client.

*Financial Planning.* Financial plans are reviewed and updated as necessary on an annual basis. Financial planning services are provided on a non-discretionary basis, which means that you retain the right to decide whether to implement any of our recommendations.

*Investment Management.* We primarily use exchange-traded funds (ETFs) in client portfolios, but may also employ stocks, bonds, mutual funds or money market funds, if appropriate for your circumstances. Investment portfolios are reviewed on a quarterly basis and rebalanced as needed. Investment portfolios are managed on a discretionary basis. This means that we have the authority to place trades to buy or sell securities of any type and in amounts that we deem to be appropriate for the portfolio, without obtaining your prior consent to each transaction. Portfolios are managed consistent with your goals and objectives, as identified through the financial planning process.

*Additional Information.* This is a brief summary of our services. Additional information is available in our Form ADV Part 2A (Firm Brochure). See [Item 5 – Additional Information](#) below for instructions on how to obtain our Firm Brochure.

##### **Conversation Starters\***

Ask your investment adviser:

- *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?*

#### Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

##### WHAT FEES WILL I PAY?

*Principal Fees and Costs.* For investment management services, we charge a fee based on a percentage of assets under management under a tiered fee schedule ranges from 0.30% to 1.25% annually, billed monthly in arrears based on account value on the last trading day of the month. We reserve the right to offer fee waivers or discounts. Fees are negotiable.

*Wrap Fee Programs.* We do not offer a wrap fee program.

*Other Fees and Costs.* In addition to our advisory fees, you may incur other fees and costs, such as custodian fees, account maintenance fees, fees related to mutual funds, or other administrative fees. Please refer to Item 5 of our Firm Brochure for details on additional fees.

*Additional Information.* You will pay fees and costs 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. Additional information about our fees is available in our Firm Brochure. See [Item 5 – Additional Information](#) below for instructions on how to obtain our Firm Brochure.

##### **Conversation Starters\***

Ask your investment adviser:

- *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 ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY, AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

**When we act as your investment adviser,** we have to 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:

**Conflicts of Interest.** An asset-based fee presents a conflict of interest because the more assets you have in your portfolio, the more compensation we will receive. Therefore, we have an incentive to encourage you to increase assets under our management. This conflict is mitigated because you have the discretion to determine your plan contributions. We do not offer any proprietary products.

Nicolas Davis, the owner of our firm, is also a managing member and independent insurance agent of Brindle & Bay Wealth Management, LLC. He may recommend insurance products to our clients. Clients are not obligated to purchase any recommended insurance product through him, but if they choose to do so, he will receive a commission. In addition, Mr. Davis has made a personal investment in Altruist Corporation, the parent company of Altruist Financial LLC (“Altruist”), the qualified custodian and broker-dealer we use to hold client accounts. This presents a conflict of interest because Mr. Davis or other Investment Adviser Representatives of our firm have an incentive to recommend or continue using Altruist as the qualified custodian based on Mr. Davis’s personal investment rather than solely considering our clients’ best interests. However, we periodically evaluate the services provided by Altruist to our clients to ensure they remain appropriate for our clients.

We entered into a referral agreement with Domain Money Advisors, LLC (“Domain”), an SEC-registered investment adviser. Under this arrangement, Domain compensates us for referring prospective clients who engage Domain for financial planning services. This compensation creates a conflict of interest because Brindle & Bay Financial Advisors has a financial incentive to recommend Domain over other advisory firms. Clients do not pay any additional fees as a result of this arrangement.

**Additional Information.** Additional information is available in our Firm Brochure. See [Item 5 – Additional Information](#) below for instructions on how to obtain our Firm Brochure.

#### **Conversation Starters\***

Ask your investment adviser:

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

#### HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are paid a fixed salary and may receive a discretionary bonus. Salaries are not based on factors such as the number of clients served, amount of client assets managed, or specific products or services recommended. Nicolas Davis is the sole shareholder of the firm and receives economic benefit from the overall profitability of the firm. As mentioned above, Nicolas is also an independent insurance agent and receives insurance commissions.

#### **Item 4 – Disciplinary History**

##### DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Visit [investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

#### **Conversation Starters\***

Ask your investment adviser:

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

#### **Item 5 – Additional Information**

Additional information is available in our Firm Brochure. Our current Firm Brochure and our current Form CRS are available on our website at [www.brindleandbay.com](http://www.brindleandbay.com). You may also call us at (214) 988-9178 to request copies of these documents at any time, free of charge. Additional information about Brindle & Bay Financial Advisors is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by conducting a Firm search using our identification number 291747.

#### **Conversation Starters\***

Ask your investment adviser:

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

#### **Exhibit A – Summary of Material Changes**

Since our last Form CRS dated March 21, 2025, we have made the following material changes:

- We removed the initial fee requirement for reviews, account setup, and financial plan creation.
- We reserve the right to offer fee waivers or discounts. Our fee is negotiable.
- We added information regarding a referral arrangement with Domain Money Advisors, LLC. See Item 3, *Fees, Costs, Conflicts, and Standard of Conduct*, for further information.

*\*Conversation Starters are questions to help you initiate conversations with prospective financial service providers about their services, fees, and other important information.*