

Name of Investment Adviser: Bradway Financial, LLC					
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code	Telephone Number
734 Bliss Road, Suite 2	Longmeadow	MA	01106	800 725-1622	2

This part of Form ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any governmental authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential Persons who are not to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

1. A. Advisory Services and Fees. (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

<input checked="" type="checkbox"/> (1) Provides investment supervisory services	40 %
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	_____ %
<input checked="" type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	10 %
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	_____ %
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	_____ %
<input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which client may use to evaluate securities	_____ %
<input checked="" type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	50 %
<input type="checkbox"/> (8) Provides a timing service	_____ %
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	_____ %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

<input checked="" type="checkbox"/> (1) A percentage of assets under management	<input type="checkbox"/> (4) Subscription fees
<input checked="" type="checkbox"/> (2) Hourly charges	<input type="checkbox"/> (5) Commissions
<input type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input type="checkbox"/> (6) Other

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of Clients -- Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/> A. Individuals	<input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations
<input type="checkbox"/> B. Banks or thrift institutions	<input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above
<input type="checkbox"/> C. Investment companies	<input type="checkbox"/> G. Other (describe on Schedule F)
<input checked="" type="checkbox"/> D. Pension and profit sharing plans	

3. Types of Investments Applicant offers advice on the following: (check those that apply)

- | | |
|---|--|
| <p>A. Equity securities</p> <p><input type="checkbox"/> (1) exchange-listed securities</p> <p><input type="checkbox"/> (2) securities traded over-the-counter</p> <p><input type="checkbox"/> (3) foreign issuers</p> <p>B. Warrants</p> <p>C. Corporate debt securities
(other than commercial paper)</p> <p>D. Commercial paper</p> <p>E. Certificates of deposit</p> <p>F. Municipal securities</p> <p>G. Investment company securities:</p> <p><input type="checkbox"/> (1) variable life insurance</p> <p><input type="checkbox"/> (2) variable annuities</p> <p><input type="checkbox"/> (3) mutual fund shares</p> | <p><input type="checkbox"/> H. United States governmental securities</p> <p>I. Options contracts on:</p> <p><input type="checkbox"/> (1) securities</p> <p><input type="checkbox"/> (2) commodities</p> <p>J. Futures contracts on:</p> <p><input type="checkbox"/> (1) tangibles</p> <p><input type="checkbox"/> (2) intangibles</p> <p>K. Interests in partnerships investing in:</p> <p><input type="checkbox"/> (1) real estate</p> <p><input type="checkbox"/> (2) oil and gas interests</p> <p><input type="checkbox"/> (3) other (explain on Schedule F)</p> <p><input type="checkbox"/> L. Other (explain on Schedule F)</p> |
|---|--|

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|--|--|
| <p>(1) <input type="checkbox"/> Charting</p> <p>(2) <input type="checkbox"/> Fundamental</p> <p>(3) <input type="checkbox"/> Technical</p> | <p>(4) <input type="checkbox"/> Cyclical</p> <p>(5) <input type="checkbox"/> Other (explain on Schedule F)</p> |
|--|--|

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|--|--|
| <p>(1) <input type="checkbox"/> Financial newspapers and magazines</p> <p>(2) <input type="checkbox"/> Inspections of corporate activities</p> <p>(3) <input type="checkbox"/> Research materials prepared by others</p> <p>(4) <input type="checkbox"/> Corporate rating services</p> | <p>(5) <input type="checkbox"/> Timing services</p> <p>(6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission</p> <p>(7) <input type="checkbox"/> Company press releases</p> <p>(8) <input type="checkbox"/> Other (explain on Schedule F)</p> |
|--|--|

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|---|---|
| <p>(1) <input type="checkbox"/> Long term purchases (securities held at least a year)</p> <p>(2) <input type="checkbox"/> Short term purchases (securities sold within a year)</p> <p>(3) <input type="checkbox"/> Trading (securities sold within 30 days)</p> <p>(4) <input type="checkbox"/> Short sales</p> | <p>(5) <input type="checkbox"/> Margin transactions</p> <p>(6) <input type="checkbox"/> Option writing, including covered options, uncovered options, or spreading strategies</p> <p>(7) <input type="checkbox"/> Other (explain on Schedule F)</p> |
|---|---|

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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5. Education and Business Standards.

Yes No

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?.....

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| • name | • formal education after high school |
| • year of birth | • business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<input type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input type="checkbox"/> (11) real estate broker or dealer
<input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

Yes No

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?...

(If yes, describe on Schedule F the partnerships and what they invest in.)

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9. Participation of Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services <i>and</i> impose a minimum dollar value of assets or other conditions for starting or maintaining an account?	Yes	No
(If yes, describe on Schedule F.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggers factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.
- Fidelity accounts are reviewed on a monthly basis and held-away accounts are reviewed on a quarterly basis. Reviews are conducted in the same manner regardless of account size. Applicant compares a consolidated view of Fidelity and held-away accounts to each client's model portfolio as well as to benchmarks for each asset class. Accounts are rebalanced to the model allocation at Applicant's discretion. Quarterly, each client's model portfolio is reviewed for suitability and adjusted as necessary at Applicant's discretion. Interim reviews are held due to changes in a client's needs or in market conditions. All clients that have previously entered into a financial planning agreement are contacted at least annually and offered a comprehensive review. Plans are updated with current information provided by the client and recommendations are given. Clients may request a plan review at any time due to changes in their circumstances. All plan reviews are performed by Brian K. Case.
- B. Describe below the nature and frequency of regular reports to clients on their accounts.
- Investment management clients receive monthly statements and year end tax statements generated by Fidelity Investments as well as regular statements from various mutual fund and insurance companies. Case issues quarterly reports that include performance, benchmark and allocation information for Fidelity accounts. Reports are posted to a secure website and clients are notified by email of their availability. Reports are held in archive on the website for future reference. Quarterly reports are verified by Case prior to delivery to the client. Clients have access to an account aggregation website maintained by CashEdge where they can review a consolidated view of all Fidelity and held-away accounts. Clients also have the ability to view Fidelity account information at www.fidelity.com.

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | | |
|--|-----------------------|-----------------------|
| (1) securities to be bought or sold? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| (2) amount of the securities to be bought or sold? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| (3) broker or dealer to be used? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| (4) commission rates paid? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |

B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commission higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|-----------------------|-----------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Bradway Financial, LLC	SEC File Number: 801-	Date: 1/1/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: Bradway Financial, LLC	IRS Empl. Ident. No.: 04-3164590
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Item of Form (identify)	Answer
1.D.	<p>This brochure provides information about the qualifications and business practices of Bradway Financial, LLC ("Bradway") . Please contact Brian K Case, Managing Member and Chief Compliance Officer, if you have any questions about the contents of this brochure. 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.</p> <p>Additional information about Bradway is available on the Internet at www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_OrgSearch.aspx. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Bradway is 117480.</p> <p><u>INVESTMENT SERVICES</u></p> <p>Bradway offers a combination of the following advisory services, where appropriate, to individuals, pension and profit sharing plans, trusts, estates or charitable organizations and corporations or other business entities.</p> <p>PORTFOLIO MANAGMENT SERVICES:</p> <p>Bradway furnishes investment supervisory services to meet the individual needs of his clients. The Applicant has selected various no-load and load-waived mutual funds and has developed an asset allocation program. Risk tolerance and investment objective is determined for each client through a series of interviews and a model portfolio is designed to suit their specific needs. The Applicant has developed an asset allocation strategy and continually updates and modifies that strategy based on market conditions as well as changing client needs. Bradway has the authority to determine, without obtaining specific client consent the securities to be brought or sold, the amount of the securities to be bought or sold and without any limitations on the authority. Portfolios are reviewed on a quarterly basis and rebalanced to the model portfolio. Each client receives monthly transactional statements and quarterly performance reports. All accounts are reviewed at least quarterly for suitability.</p> <p>The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.</p> <p>Each client enters into an Investment Management Agreement with Bradway pursuant</p>

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Item of Form (identify)	Answer
	<p>to which the client is advised in establishing objectives, developing an investment strategy to meet those objectives, identifying appropriate investments and monitoring such investments.</p> <p>Fee Schedule: In consideration of such services, Bradway receives an Investment Advisory fee, which is billed quarterly in arrears based on the account asset value on the last business day of the calendar quarter. The initial fee is prorated based on the number of days in the quarter since the account was established. Investment Advisory fees typically range from .25% to 1.5% based upon assets under management and the degree service required. Fees may be directly debited from client accounts in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Discretionary Investment Management Contract.</p> <p>The Investment Advisory fee does not cover any custodial or brokerage services, fees charged by the Securities and Exchange Commission based on the sale of a security, wire transfer fees, costs associated with the operation of a client beneficial money market account, any special requests by the client or any internal management or operating fees or expenses imposed or incurred by a mutual fund in which the client's account may be invested. Comparable services may be available from other sources for fees lower or higher than those charged by the Applicant. Fees are negotiable in some special circumstances. Requests for refunds or termination of engagements must be made in writing and will be processed within one month from the date of request. Upon the termination of an Investment Advisory agreement the quarterly fee will be prorated based upon the number of days in the quarter through the date of termination.</p> <p>FINANCIAL PLANNING AND CONSULTING:</p> <p>Bradway provides financial planning advice. Personal financial planning services address subjects such as goals planning, investment strategies, income tax planning, estate planning, insurance, cash flow and debt management. Financial planning reports range from financial analyses addressing one or more issues of financial planning to financial plan documents addressing several of the subjects listed above.</p> <p>Bradway may also help clients establish realistic investment objectives; determine the minimum rate of return required to meet their goals; educate clients about investment strategies; and determine proper investment policy and asset allocation.</p> <p>Bradway gathers required information through a series of personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client, which may include a questionnaire, are carefully reviewed and reports or financial analyses are issued.</p>

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	<p>Should a client choose to implement the recommendations contained in the plan, Bradway may suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.</p> <p>Clients not in need of services described above can receive advice on a more limited basis. This service may include advice on isolated areas of concern, such as estate planning, retirement planning, or any other specific topic within our firm's areas of expertise. Bradway also offer to provide specific consultation and administrative services on investment concerns of clients.</p> <p>Furthermore, Bradway provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, pension/profit sharing design, administration and installation, life and disability insurance and/or annuity advice.</p> <p>Fee Schedule: Financial planning and consulting services are billed at a rate of \$150 per hour for the planners time and \$75 per hour for administrative time, and may be outlined in an engagement letter at the Clients request. Such fees shall only be billed by Bradway upon mutual agreement with the client, and shall be due and payable under the terms of the agreement. A client agreement may be cancelled at any time, for any reason, upon receipt of 30 days written notice by either party. Unearned or prepaid fees will be refunded within 30 days of cancellation.</p> <p>BRADWAY CAPITAL INSIGHT FUND, LLC:</p> <p>Bradway Capital Insight Fund, LLC (the "BCI Fund"), a Connecticut limited liability company organized in November, 2006, was formed to operate as a private investment fund. Bradway Financial, LLC ("Bradway") is the investment manager of the BCI Fund and is responsible for researching, selecting and monitoring investments by the BCI Fund. Brian K. Case, the managing member of Bradway, is also the manager of the BCI Fund and is responsible for the day-to-day operations of the BCI Fund.</p> <p>Bradway Capital Advisors, LLC ("BCA"), a Connecticut limited liability company, is a member of the BCI Fund and serves as an adviser to Bradway in Bradway's capacity as the investment manager of the BCI Fund. BCA offers advice to Bradway on general economic matters and investment strategies, and reviews Bradway's investment philosophies and the investments it makes on behalf of the BCI Fund. Brian K. Case, managing member of Bradway and manager of the BCI Fund, is also member of BCA.</p> <p>The BCI Fund is a hedge fund designed to pool investment funds of investors for the purpose of investing and trading in a wide variety of securities and financial instruments, domestic and foreign, of all kinds and descriptions, whether publicly</p>

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	<p>traded or privately placed, including but not limited to equity, debt, real estate, convertible securities, preferred stock, options, warrants and monetary instruments. The BCI Fund's mission is to generate superior long-term returns while minimizing risk for its investors.</p> <p>In building, growing and maintaining its portfolio of investments for the BCI Fund, Bradway will follow certain portfolio management principles. Bradway takes a rigorous approach to investing by combining thorough research, careful analysis, patience and discipline. The following principles provide an overview of the tenets that guide its portfolio management strategy and allocation of capital: (1) invest with a long-term perspective, minimize turnover and avoid market timing; (2) hold a concentrated investment portfolio; (3) infrequently use leverage or options or other derivatives; (4) view each investment relative to other investment opportunities; and (5) focus on public equities.</p> <p>Investment in the BCI Fund is open only to accredited investors as defined in Rule 501 of The Securities Exchange Act of 1933. The minimum initial investment is \$500,000, and the minimum amount for additional investments is \$50,000, subject to the manager's discretion to accept lesser amounts.</p> <p>Distributions: The economic gains and losses of the BCI Fund will be shared in the following manner. The BCI Fund allocates net income or loss (increases and decreases in net asset value (as defined below)) to each member's capital account. Net income or loss includes all portfolio gains and losses, whether realized or unrealized, plus all other BCI Fund items of income (such as interest) and less all BCI Fund expenses. Generally, net income and net loss for each fiscal year quarter (or such other period as the manager shall determine) will be allocated to the members as of the end of such fiscal quarter (or such other period, as the case may be) in proportion to their capital account balances as of the start of each fiscal quarter or such other period, as the case may be. Capital account balances will reflect capital contributions, previous allocations of increases and decreases in net asset value and withdrawals. The fiscal year of the BCI Fund will be the calendar year.</p> <p>Performance Based Fees: BCA will receive an additional distribution to its capital account based on the net profits of the BCI Fund each year calculated on a calendar basis, determined as follows: (i) BCA shall receive no portion of the first 5% of net profit of the BCI Fund for any year; (ii) the next 0.75% of the net profit of the BCI Fund for such year shall be added to the capital account of BCA, and (iii) 15% of all additional net profit of the BCI Fund for such year shall be added to the capital account of BCA. There shall be no deduction from the capital account of BCA for net losses in each year; and no "high water mark" shall be considered in making such allocations to the capital account of BCA. BCA receives this additional distribution as compensation for the advisory services it provides to Bradway and the BCI Fund and is above and</p>

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	<p>beyond the allocation of profit it would normally receive as a member of the BCI Fund.</p> <p>This performance based fee may create an incentive for BCA to recommend investments to Bradway and for Bradway to make investments for the BCI Fund which may be riskier or more speculative than those which would be made under a different fee arrangement. The Investment Advisers Act of 1940 and certain state laws restrict the payment of performance based fees to investment advisers registered under such act. However, SEC Rule 205-3 permits the payment of performance based compensation to registered investment advisers provided that the clients (including investors in investment vehicles such as the BCI Fund) meet certain financial qualifications.</p> <p>The offering of membership in the BCI Fund, as well as the acceptance of non-BCI Fund advisory accounts, are structured to comply with this rule and accordingly the BCI Fund will only accept subscriptions from investors who meet the qualifications set forth in Rule 205-3.</p> <p>Management Fees: The BCI Fund shall pay Bradway a management fee which shall be payable quarterly and in advance, of up to 0.25% (1.0% annually) of the BCI Fund's net asset value (determined as of the first day of each fiscal quarter). Certain administrative expenses will be incurred by the BCI Fund, such as the expenses related to the preparation of financial statements and tax returns. The total of the management fee and all expenses of the BCI Fund, its manager Brian K. Case, and its investment manager Bradway, shall not exceed 1% per year of the BCI Fund's net asset value (determined on a quarterly basis). Brian K. Case receives no separate fee or interest in the BCI Fund for acting as manager of the BCI Fund.</p> <p>Investors and prospective investors in the BCI Fund are requested to refer to the applicable private placement memorandum and subscription agreement for complete information on the services offered and the corresponding fees charged by the BCI Fund.</p> <p>GENERAL INFORMATION:</p> <p>All fees paid to Bradway for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of Bradway. In that case, the client would not receive the services provided by Bradway which are designed to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the custodian to fully understand the total amount of</p>

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Item of Form (identify)	Answer
5	<p>fees to be paid for these services.</p> <p>Proxy Disclosure: As a matter of firm policy and practice, Bradway does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. However, Bradway may provide advice to clients regarding the clients' voting of proxies.</p> <p>Bradway requires that all employees involved in determining or giving investment advice to clients are college graduates or have an equivalent level of business experience</p>
6	<p>Brian K. Case, born 1969; Springfield Technical Community College; Western New England College; Bradway Financial Services - Managing Member & Chief Compliance Officer, 09/2003 to present; MassMutual Financial Group - Advisor, 07/1997 to 09/2003; LPL Financial Services - Sales Assistant, 01/1996 to 06/1997; Field Information Services, 08/1995 to 12/1995.</p> <p>Craig Andrew Roncaioli, born 1955, University of Connecticut-Storrs, Bachelor of Science in Education, 1977; Bradway Financial Services - Advisor, MM/2007 to present; Advice One LLC - Advisor, 05/2001 to present; MassMutual Financial Group - Advisor, 01/1991 to 05/2001.</p>
7.A., 7.B., 7.C., 8.C.(9) & 9.D.	<p>Brian K. Case, Member of Bradway, is separately licensed as an insurance broker for one or more insurance companies. As such, Brian K. Case, in his separate capacity as an insurance broker, will be able to purchase investment products (insurance) for clients, for which he will receive separate, yet customary compensation for insurance and/or annuity implementation (including trailing commissions). Clients, however, are not under any obligation to engage Brian K. Case when considering implementation of advisory recommendations. The implementation of any or all insurance recommendations is solely at the discretion of the client. Brian K. Case may spend as much as 25% of his time with these activities.</p> <p>While Brian K. Case endeavors at all times to put the interest of the clients first as part of Bradway's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of Mr. Bradway when making insurance recommendations.</p> <p>Brian K. Case also owns a bicycle retail business known as Fit to Ride in Somers, CT (formerly State Line Cycles in Enfield, CT). He spends an average of ten hours per week in this business.</p>

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Bradway Financial, LLC	SEC File Number: 801-	Date: 1/1/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: Bradway Financial, LLC	IRS Empl. Ident. No.: 04-3164590
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Item of Form (identify)	Answer
9.E.	<p>Moreover, Brian K. Case is also the managing member of a limited liability company (LLC), Over the Bars, LLC, formed for real estate investment purposes. While certain existing advisory clients of Bradway are invested in this LLC, Brian K. Case will not solicit new clients to invest in the LLC. Brian K. Case does not receive investment advisory compensation in relation to these investments, but does have a conflict of interest in soliciting client investments. Advisory clients are under no obligation to participate in such investments. The members of Bradway will disclose to clients any affiliations to any such investment(s) at the time of the solicitation.</p> <p>Bradway has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Bradway's Code of Ethics requires high standards of business conduct and compliance with applicable federal and state securities laws. Bradway's Code of Ethics stresses that no person employed by Bradway shall prefer his/her own interests to those of advisory clients and prohibits the use of material non-public information. To supervise compliance with its Code of Ethics, Bradway requires that anyone associated with this advisory practice with access to advisory recommendations, client holdings or other specified information to provide annual securities holdings reports and quarterly transaction reports of all reportable transactions to the firm's Chief Compliance Officer. Bradway's Code of Ethics also provides for sanctions when appropriate. A copy of Bradway's Code of Ethics is available to Bradway's advisory clients upon request to Brian K. Case, Member and Chief Compliance Officer, at Bradway's principal office address.</p>
12.A.(1) & 12.A.(2)	<p>For discretionary management clients, Bradway requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold.</p> <p>Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.</p>
12.B.	<p>Bradway does not have the discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct Bradway as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that Bradway will not have authority to negotiate commissions or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients.</p> <p>Bradway participates in the Fidelity Registered Investment Advisor Group ('FRIAG') program, sponsored by Fidelity Brokerage Services LLC, an FINRA registered broker dealer. Clients in need of brokerage and custodial services will have Fidelity Brokerage Services LLC recommended to them. As part of the FRIAG program, Bradway receives benefits that it would not receive if it did not offer investment advice (See the</p>

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Bradway Financial, LLC	SEC File Number: 801-	Date: 1/1/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: Bradway Financial, LLC	IRS Empl. Ident. No.: 04-3164590
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Item of Form (identify)	Answer
13.A.	<p>disclosure under Item 13.A. of this Schedule F narrative).</p> <p>Bradway reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than Fidelity, if Bradway believes that the broker dealer would adversely affect Bradway's fiduciary duty to the client and/or ability to effectively service the client portfolio.</p> <p>Bradway will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows Bradway to execute certain trades in a more timely, equitable manner and to reduce overall commission charges to clients. No personal trades will ever be included in any client blocks.</p> <p>Bradway will not be able to block trades for client accounts who direct the use of broker other than Fidelity, and therefore a disparity in commission charges may exist between the commissions charged to other clients.</p> <p>As indicated under the disclosure for Item 12.B., Bradway utilizes the services of the Fidelity Registered Investment Advisor Group ('FRIAG') program sponsored by Fidelity Brokerage Services LLC ('Fidelity'). While there is no direct linkage (except in certain circumstances) between the investment advice given to clients and Bradway's participation in the FRIAG program, economic benefits are received by Bradway which would not be received if Bradway did not give investment advice to clients. These benefits may include: A dedicated trading desk that services FRIAG participants exclusively, a dedicated service group and an account services manager dedicated to Bradway's accounts, access to a real-time order matching system, ability to 'block' client trades, electronic download of trades, balances and positions, access, for a fee, to an electronic interface with FRIAG's software, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements), availability of third-party research and technology through 'soft dollar' arrangements, a quarterly newsletter, access to Fidelity mutual funds, access to AdvisorChannel.com (internet access to statements, confirmations and transfer of asset status), access to Account View (through which clients may access their account information over the internet via Bradway's website), access to over 350 mutual fund families and 4,500 mutual funds NOT affiliated with Fidelity, of which over 2,000 have no transaction fee, ability to have loads waived for Bradway's clients who invest in certain Fidelity loaded funds, when certain conditions are met and maintained and the ability to have custody fees waived (when negotiated by the adviser and allowed under certain circumstances).</p> <p>The benefits received through participation in the FRIAG program may depend upon</p>

**Schedule F of
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Part II**

Applicant: Bradway Financial, LLC	SEC File Number: 801-	Date: 1/1/2009
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1. Full name of applicant exactly as stated in Item 1A of Form ADV: Bradway Financial, LLC	IRS Empl. Ident. No.: 04-3164590
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Item of Form (identify)	Answer
	the amount of transactions directed to, or amount of assets custodied by, Fidelity Brokerage Services LLC.