

Introduction: Robert Bender & Associates, an SEC Registered Investment Adviser established in 1972 specializes in the management of retirement and non-retirement equity and balanced asset portfolios for capital appreciation in the domestic and international markets for individuals and small companies.

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| <p>What investment services and advice can you provide me?</p> | <p>The firm specializes in the management of equity and balanced asset portfolios for capital appreciation in the domestic and international markets.</p> <p>The foundation of our investment philosophy is a commitment to capital appreciation well in excess of economic and general market growth, while limiting exposure to fundamental risk. We achieve this by following a disciplined approach to investing in high-quality sustainable growth companies.</p> <p>Robert Bender and Reed Bender are the investment professionals who will personally oversee the investments in your account. Collectively, they have over 75 years of experience in the investment advisory field.</p> | <p>Conversation starters:</p> <ul style="list-style-type: none"> ◆ <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i> ◆ <i>How will you choose investments to recommend to me?</i> ◆ <i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i> |
| <p>What fees will I pay?</p> | <p>Each account pays an annual percentage fee to our firm, billed and payable quarterly, in advance based on the value of the account on the final day of the most recent quarter. In addition, each account is responsible for fees paid to the custodian which typically include maintenance fees and trading costs. Some account holders opt to establish wrap accounts with their custodian of choice and would pay additional fees for that service.</p> <p>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.</p> | <p>Conversation starter:</p> <ul style="list-style-type: none"> ◆ <i>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 how much will be invested for me?</i> |
| <p>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?</p> | <p>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 of 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:</p> <p>Our fee is based on your account value. When your account is more valuable our fee is increased.</p> <p>A notable conflict is the fact that the principals and members of our firm also invest in the same stocks that we recommend for your account. We have</p> | <p>Conversation starter:</p> <ul style="list-style-type: none"> ◆ <i>How might your conflicts of interest affect me, and how will you address them?</i> |

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| | <p>implemented procedures to prioritize client trading over that of the members of our firm and continue to monitor the effectiveness of that policy.</p> <p>The only activity which provides revenue for our firm is the investment advisory business described in this form.</p> | |
| How do your financial professionals make money? | <p>All financial professionals are employees of the firm and are compensated solely on a salaried basis. Employees also receive non-monetary benefits such as health insurance and paid parking.</p> | <p>Conversation starters:</p> <ul style="list-style-type: none"> ♦ <i>What are other ways that investment professionals could be compensated, other than by salary?</i> |
| Do you or your financial professionals have legal or disciplinary history? | <p>Neither the firm nor any of the members of our firm have a legal or disciplinary history.</p> <p>For further information regarding Form CRS, please visit https://www.investor.gov/CRS</p> | <p>Conversation starters:</p> <ul style="list-style-type: none"> ♦ <i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i> |
| Additional information | <p>Any questions you have can be directed to our office at 626.397.9072 or by email at info@robertbender.com</p> <p>Specific questions can be directed to the following individuals:</p> <p>Robert L. Bender, President Reed G. Bender, VP - Portfolio Management Cathy Emmett, Chief Compliance Officer</p> | <p>Conversation starters:</p> <ul style="list-style-type: none"> ♦ <i>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?</i> |