
Item 1 – Introduction

- A. Brady Investment Counsel LLC ("Brady") is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences.
- B. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – Relationships and Services**A. What Investment Services and Advice Can You Provide Me?**

- B. **Services Offered:** We provide discretionary investment management services to retail investors, including high-net-worth individuals, charitable foundations, religious organizations, and pension and profit-sharing plans. As your discretionary manager, we make investment decisions on your behalf without requiring your approval for each transaction, guided by your stated investment objectives and constraints. We monitor client accounts on an ongoing basis. We tend to limit our client advice to securities and investments we understand. Typically, our clients fall under one of the following **Brady Investment Counsel Proprietary Investment Strategies**:

- **Core Growth** – Diversified equity portfolio targeting long-term capital appreciation.
- **Growth & Income** – Balanced approach combining growth equities with income-generating assets.
- **Focus** – Concentrated, high-conviction equity portfolio.
- **Balanced** – Mixed allocation of equities and fixed income.
- **ETF Solutions** – Cost-efficient, diversified market exposure via exchange-traded funds.

Our investment approach is active, long-term, and socially responsible, driven by in-house fundamental research and a proprietary equity valuation model. We emphasize tax efficiency and customized portfolio construction. We generally **require a minimum account size of \$3,000,000**. Minimums may be waived at our discretion based on individual circumstances.

- C. **Additional Information:** For more information about our services, we recommend reading our ADV Part 2A Items 4, and 7.
- D. **Conversation Starters:**
1. [Given my financial situation, should I choose an investment advisory service? Why or why not?](#)
 2. [How will you choose investments to recommend to me?](#)
 3. [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**A. Fees:**

What Fees will I pay? 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. Asset-based management fees paid by you and the rest of our clients make up the overwhelming source of Brady revenue.

We charge a flat annual management fee of 0.75% of assets under management (AUM), billed quarterly in arrears based on the market value of your account at the end of the prior quarter.

Assets Under Management	Annual Rate	Quarterly Rate
All Assets	0.75%	0.1875%

Fees are deducted from your account by your custodian after we inform your custodian of the amount owed. It is your responsibility to check fee accuracy each quarter and let us know if you have questions concerning the amount withdrawn by your custodian or how your fee was calculated.

In addition to our advisory fee, you will pay custodial and brokerage transaction costs charged by your custodian, and the internal operating expenses of any mutual funds or ETFs held in your account. These third-party costs are not shared with Brady. For full details on all fees and costs, see our Form ADV Part 2A, available at [Investor.gov/CRS](https://www.investor.gov/CRS) or upon request.

B. Conflicts & Standards of Conduct:

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?

Standard of Conduct: 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.

1. We may invest in the same securities as our clients, creating a conflict of interest because we have an incentive to favor our own accounts over client accounts when making investment and trading decisions.
2. Also, the more assets we manage, the more money we make. This creates an incentive on our part to encourage you to invest more with Brady

We manage this conflict by our fiduciary obligation to act in your best interest and by full disclosure. We do not receive commissions, 12b-1 fees, or third-party compensation.

C. Financial Professional Compensation

How do your financial professionals make money? We currently have one financial professional. His compensation equals our fees collected minus all operating expenses.

Conversation Starters:

1. 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?
2. How might your conflicts of interest affect me, and how will you address them?
3. Why do you personally invest in the same securities as your clients?

Item 4 – Disciplinary History

A. **Do you or your financial professionals have legal or disciplinary history?**

B. **No.** Brady and its financial professionals have no legal or disciplinary history.

Conversation Starter

1. As a financial professional, do you have any disciplinary history? For what type of conduct?
2. **Visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research you and your financial professionals.**

Item 5 – Additional Information

For more detailed information about our services, please review our Form ADV Part 2A Brochure, available on the SEC's website at www.adviserinfo.sec.gov or by contacting us at (630) 453-0016 or david.brady@bradyinvestmentcounsel.com. To request a copy of this Form CRS or to report a problem, contact us at the number or email address above.

Conversation Starter

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