



# Firm Brochure

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## Form ADV Part 2A

**June 21, 2013**

Gamblin Financial Advisors LLC

3935 NW 32<sup>ND</sup> Street

Gainesville, FL 32605

This brochure provides clients and prospective clients with information about the qualifications and business practices of Gamblin Financial Advisors LLC. If you have any questions about contents of this brochure please contact Nicholas Gamblin at 352-870-5546, or [Nicholas.A.Gamblin@gmail.com](mailto:Nicholas.A.Gamblin@gmail.com). The information provided has not been approved or verified by the Florida Office of Financial Regulation or the United States Securities and Exchange Commission.

Gamblin Financial Advisors LLC is a Registered Investment Advisor in the State of Florida. Registration does not imply a certain level of skill or training. Additional Information about Gamblin Financial Advisors LLC is available on the Securities and Exchange Commission website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

Gamblin Financial Advisors LLC is a new Registered Investment Advisor (RIA) and this is the first firm brochure. There are no material changes.

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## Item 4 – Advisory Business

### Description of Gamblin Financial Advisors LLC

Gamblin Financial Advisors LLC (“GFA”) is a Registered Investment Advisor with the State of Florida Office of Financial Regulation. GFA LLC is managed by the sole member and firm principal Nicholas A Gamblin who founded the company on May 27, 2012.

### Advisory Services Offered

The mission statement of Gamblin Financial Advisors guides what we do and how we do it. It states:

*We commit to understand, educate and inspire our clients....to achieve their personal goals with a plan that gives hope.*

– Nicholas A Gamblin, 2012

### Financial Planning

GFA offers comprehensive financial planning to individuals and households. The financial planning process is collaborative effort between the client and advisor that does the following:

- Analyzes the client’s current financial situation
- Identifies the client’s financial goals
- Creates a written plan to achieve those goals
- Implements the financial plan
- Monitors the plan’s effectiveness and results
- Adjusts as the client’s financial situation or goals change

### Investment Advice and Portfolio Management

GFA offers investment advice and asset allocation strategies designed to achieve the client’s investment objectives while limiting risk. We will work to educate our clients about the attributes of various investments including mutual funds, bonds, common and preferred stocks, exchange traded funds, options, money market funds, certificates of deposit and other investment options. It is our goal to help our clients make informed investment decisions.

GFA also provides discretionary portfolio management. Investment decisions will be made by the advisor or an independent third party money manager. The advisor will implement a strategy that takes into consideration the client’s personal financial situation including the age, employment status and income, investment objectives, risk tolerance, time horizon, and other assets and liabilities held by the client.

### How we tailor our service to fit your needs

We believe the first job of a financial advisor is to know the client; to know their current financial situation and to know their hopes and dreams. Our aim is to help you achieve your goals by giving you financial guidance, a written financial plan and the necessary motivation and encouragement. We tailor our investment advice to meet the individual needs of each client.

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## Assets Under Management

GFA is a startup Registered Investment Advisor and has no assets under management as of June 21, 2013.

## Item 5 – Fees and Compensation

### Investment Advisory Fee

Clients will pay GFA a monthly Investment Advisory Fee that is determined by the average value of the account(s). Fees are charged monthly. The formula used to calculate the fee amount is:

$$(\text{average account value for the month}) \times (\text{number of days in the month}) \times (\text{annual fee rate}) \div 365$$

The client annual fee rate is as follows:

Account Value	Annual Advisory Fee Rate
Less than \$100,000.00	1.460 %
\$100,000.00 - \$250,000.00	1.095 %
\$250,000.00 - \$1,000,000.00	.876 %
\$1,000,000.00 and up	.730 %

Some client fees may be negotiable based on a number of factors including, but not limited to, the amount of the assets under management, investment advice on assets not directly managed by GFA, comprehensive financial planning and other client related services provided. To the extent that fees are negotiable, they may differ from client to client

### Financial Planning Fee

Comprehensive financial planning service fees are charged separately from Investment Advisory Fee. Fees are negotiable and vary based on the size, scope and complexity of your financial planning needs.

### Terms of Payment

Financial planning service fees are payable in advance. Investment Advisory Fees are payable in arrears and will be withdrawn directly from the client's account(s) monthly.

### Other Fees

Clients will incur other fees and expenses from the custodian and broker/dealer. These fees may include, but are not limited to mutual fund fees, brokerage commissions, paper confirmation fees, overnight delivery fees, wire fees, NSF fees, and account transfer fees. GFA does not receive a portion of any of these fees.

## Item 6 – Performance Based Fees

GFA does not charge performance based fees.

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## **Item 7 – Types of Clients**

GFA generally provides financial planning and investment advice to individuals, households and small businesses. The minimum combined household account size is \$50,000.00. GFA reserves the right in its sole discretion to waive account minimums in certain circumstances.

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

GFA relies on research from various third party providers including analysts, advisors, economists and publications to formulate an opinion on specific investments or asset classes.

Our goal is to create a diversified portfolio consistent with the client's investment objectives. Regarding investments, we believe the following:

- Every strategy employed has some risk, including the loss of principle, inflation risk, currency risk, interest-rate risk, liquidity risk and credit risk.
- Diversified asset allocation improves overall risk-adjusted returns
- Market conditions have the largest impact on a portfolio's performance
- Trading too frequently can harm long term performance through increased transaction costs
- Over the long term, asset allocation will outperform market timing

Although GFA makes every effort to preserve and grow each client's capital, investing in the markets involves risk of loss that each client should be prepared to incur. Clients should understand that underlying values of stocks, bonds and other securities go up and down. Past performance is not a guarantee of future results.

## **Item 9 – Disciplinary Information**

Neither Nicholas Gamblin nor GFA have been subject to any criminal or civil actions, administrative proceeding before the SEC or any governmental regulatory agency, or any self-regulatory organization proceedings.

## **Item 10 – Other Financial Industry Activities and Affiliations**

To avoid any conflict of interest GFA is committed to remain an independent Registered Investment Advisor and is not directly affiliated with a broker-dealer. Nicholas A Gamblin is not a registered representative and does not receive compensation, fees or kickbacks from the account custodian or broker-dealer.

## **Item 11 – Code of Ethics**

As your investment advisor GFA has a duty to faithfully act in your best interests. We have adopted a Code of Ethics with principles and policies that reinforce the fiduciary responsibilities with which you

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have entrusted us. We commit to avoid any conflicts of interest, comply with federal and local securities law and maintain the highest level of personal integrity.

The Code of Ethics includes policies and procedures for the review of securities transactions reports. All proposed private placement offerings will be thoroughly reviewed and any conflict of interest will be disclosed. Supervision, enforcement and recordkeeping provisions are all provided for in the Code of Ethics.

The GFA Code of Ethics includes the firm's policy prohibiting the use of non-public (insider) information. Firm personnel are prohibited from engaging in principal transactions between their clients and themselves and in agency cross transactions between two clients.

A copy of our Code of Ethics is available upon request. Please email [Nicholas.A.Gamblin@gmail.com](mailto:Nicholas.A.Gamblin@gmail.com) or call 352-870-5546.

### **Item 12 – Brokerage Practices**

The client may choose to work with any Broker-Dealer. We may make a recommendation based on the following conditions:

1. Cost
2. Service
3. Skill
4. Dependability
5. Execution

GFA does not participate in any "soft dollar" program. We do not select broker-dealers in consideration for client referrals. We do not direct clients to a specific brokerage. We do not employ order aggregation for client accounts.

### **Item 13 – Review of Accounts**

Accounts will be regularly reviewed, insuring the current holdings are consistent with the client's investment strategy. Reports will be made available on a quarterly basis. You are encouraged to meet with your financial advisor as often as needed and no less than annually. Clients should contact GFA if any significant change in their financial situation occurs or is expected.

Custodians will provide you with transaction confirmations, account statements, and all applicable tax documents. Please review these documents carefully and contact GFA if you have any questions.

### **Item 14 – Client Referrals and Other Compensation**

In order to avoid any conflict of interests, GFA does not compensate any individual or institution for client referrals, nor does GFA receive any compensation for any client referrals.



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## **Item 15 – Custody**

Client’s assets will be held in accounts with a qualified custodian. The custodian will send statements to the client at least quarterly. Clients should carefully review all statements.

## **Item 16 – Investment Discretion**

Clients may grant discretionary authority to GFA to execute transactions on their behalf including which securities are to be bought or sold and the amount of securities to be bought or sold.

Restrictions to this authority may be made in writing and may be amended at any time. Restrictions may include specific types of securities (e.g. don’t buy options), industries (don’t buy tobacco companies), or positions (don’t sell my Ford stock).

## **Item 17 – Voting Client Securities**

GFA does not vote proxies on behalf of clients. Clients may contact us regarding voting proxy issues or questions.

## **Item 18 – Financial Information**

GFA is not subject to any financial condition that is likely to impair our ability to meet contractual commitments to clients. GFA has not been subject of a bankruptcy petition at any time.

## **Item 19 – Requirements for State Registered Advisors**

### **Education and Background**

Nicholas Gamblin is the Principal of Gamblin Financial Advisors LLC. He was born in 1979 in Rockledge, Florida and was raised in Brevard County. Nicholas earned an A.A. degree from Brevard Community College and a B.A. degree in History from the University of Florida.

Nicholas has progressive experience in the accounting field, including experience as the Chief Financial Officer and Financial and Operations Principal of Trade-PMR, Inc. a broker-dealer located in Gainesville, FL that serves Registered Investment Advisors all over the United States. While employed at Trade-PMR Nicholas passed four regulatory exams: Series 7 General Securities Representative; Series 24 General Securities Principal; Series 28 Financial Operations Principal; and Series 66 Combined State Securities Representative and Investment Advisor.

### **Outside Business Activities**

In addition to acting as the firm Principal of Gamblin Financial Advisors LLC, Nicholas is employed as the Finance Manager of RegisterPatient.com, Inc. a healthcare information technology startup company located in Gainesville, Florida. Nicholas is available by appointment in the evenings and on weekends. To

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avoid any potential or real conflict of interest Nicholas will not accept as clients any RegisterPatient.com employee while he remains employed by the company.

### **Performance Fees**

Gamblin Financial Advisors LLC does not charge performance based fees.

### **Disciplinary Information**

Nicholas Gamblin and Gamblin Financial Advisors LLC have never been involved in any regulatory, civil or criminal actions. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Nicholas Gamblin or GFA.

### **Relationships with Issuers of Securities**

Nicholas Gamblin is employed by RegisterPatient.com, Inc. a Delaware registered privately held corporation. He is exposed to information that may be considered insider information. In the unlikely event that a client asked for a recommendation, Nicholas will not make any recommendations regarding the purchase or sale of RegisterPatient.com stock, options, warrants or rights nor will he reveal any non-public information about the corporation.



# Brochure Supplement

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Form ADV Part 2B  
for  
Nicholas A. Gamblin  
Founder, Managing Member

June 21, 2013

Gamblin Financial Advisors LLC

3935 NW 32<sup>ND</sup> Street

Gainesville, FL 32605

This Firm Brochure Supplement provides information about the background and qualifications of Nicholas A. Gamblin (CRD# 6029650) that supplements the information contained in the Gamblin Financial Advisors LLC Firm Brochure. If you have any questions about either the Firm Brochure or the supplementary brochure please contact Nicholas A. Gamblin by email at [nicholas.a.gamblin@gmail.com](mailto:nicholas.a.gamblin@gmail.com) or by phone at 352-870-5546.

Additional Information about Nicholas A. Gamblin is available on the Securities and Exchange Commission website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 – Educational Background and Business Experience**

Nicholas Gamblin is the firm Principal of Gamblin Financial Advisors LLC. He was born in 1979 in Rockledge, Florida and was raised in Brevard County. Nicholas earned an A.A. degree from Brevard Community College and a B.A. degree in History from the University of Florida.

Nicholas has progressive experience in the accounting field, including experience as the Chief Financial Officer and Financial and Operations Principal of Trade-PMR, Inc. a broker-dealer located in Gainesville, FL that serves Registered Investment Advisors all over the United States. While employed at Trade-PMR Nicholas passed four regulatory exams: Series 7 General Securities Representative; Series 24 General Securities Principal; Series 28 Financial Operations Principal; and Series 66 Combined State Securities Representative and Investment Advisor.

## **Item 3 – Disciplinary Information**

Nicholas Gamblin and Gamblin Financial Advisors LLC have never been involved in any regulatory, civil or criminal actions. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Nicholas Gamblin or GFA.

## **Item 4 – Other Business Activities**

In addition to acting as the firm Principal of Gamblin Financial Advisors LLC, Nicholas is employed as the Finance Manager of RegisterPatient.com, Inc. a healthcare information technology startup company located in Gainesville, Florida. The corporation is not engaged in investment related activities. Nicholas is available by appointment in the evenings and on weekends.

## **Item 5 – Additional Compensation**

Nicholas Gamblin does not get any economic benefit from non-clients for providing financial advice.

## **Item 6 – Supervision**

Gamblin Financial Advisors LLC Managing Member, Firm Principal and Chief Compliance Officer is Nicholas Gamblin and he does not have any additional supervision. GFA has implemented a Code of Ethics that guides our financial advisory practice in meeting our fiduciary obligation to all our clients. Additionally GFA is registered with the State of Florida Office of Financial Regulation and is subject to both announced and unannounced examinations by state and federal regulators.

## **Item 7 – Requirements for State Registered Advisors**

Nicholas Gamblin does not have any additional material disclosures.