

Part 2A of Form ADV: *Firm Brochure*

BANKERS INVESTMENT COUNSELING COMPANY

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February 22, 2024

This brochure provides information about the qualifications and business practices of Banker Investment Counseling Company. If you have any questions about the contents of this brochure, please contact us at 805-933-1620 or at andy@bicc1968.com. 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. Any references to Bankers Investment Counseling Company as a “registered investment adviser” or any reference to being “registered” with the U.S. Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Additional information about bankers Investment Counseling Company is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for our firm is 325872.

Item 2. Summary of Material Changes

We have no material changes to report since the last version of this brochure that was dated July 21, 2023.

Item 3:**Table of Contents**

Item 1.	Cover Page	1
Item 2.	Material Changes	2
Item 3.	Table of Contents	3
Item 4.	Advisory Business	4
Item 5.	Fees and Compensation	5
Item 6.	Performance-Based Fees and Side-By-Side Management	7
Item 7.	Types of Clients	7
Item 8.	Methods of Analysis, Investment Strategies and Risk of Loss	7
Item 9.	Disciplinary Information	9
Item 10.	Other Financial Industry Activities and Affiliations	9
Item 11.	Code of Ethics, Interest in Client Transactions & Personal Trading	9
Item 12.	Brokerage Practices	10
Item 13.	Review of Accounts	14
Item 14.	Client Referrals and Other Compensation	14
Item 15.	Custody	14
Item 16.	Investment Discretion	15
Item 17.	Voting Client Securities	15
Item 18.	Financial Information	15
Item 19.	Requirements for State Registered Advisers	15
	Brochure Supplement: Andrew H. Killion	18

Item 4. Advisory Business

Introduction

Bankers Investment Counseling Company (“BICC” or “we”) is a California corporation with its principal place of business located in Santa Paula, California. BICC is a California-registered investment advisory firm and has been in business since 1979. BICC is owned by Andrew Killion, President and Chief Investment Officer, and Christina Killion, Silent Partner.

BICC offers and provides a combination of the following advisory services, where appropriate, to individuals, including high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations and/or business entities.

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding our firm, our representatives, and any employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

As of December 31, 2023, we were managing \$21,193,037 of client assets on a discretionary basis and \$0 client assets on a non-discretionary basis. BICC does not manage client accounts on a non-discretionary basis.

Investment Counseling Services

Bankers Investment Counseling Company provides Investment Counseling Services,. We provide continuous investment advice to a client and make investments for a client based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, BICC develops a client's personal investment policy and creates and manages a portfolio based on that policy. BICC provides this service to individuals, pension and profit sharing plans, trusts, estates, and charitable organizations, and /or business entities. BICC manages advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client (i.e., capital appreciation, growth, income, or growth and income).

BICC recommends a minimum account level of \$150,000 or a minimum annual advisory fee of \$750 for Investment Counseling Services clients, however these minimums may be negotiable under certain circumstances.

BICC will allocate the client's assets among various investments and investment classes taking into consideration the overall management style selected by the client. When appropriate, any 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 securities 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.

BICC does not participate in any wrap fee programs.

Item 5. Fees and Compensation

Investment Counseling Services

The annual fee for investment counseling services will be charged quarterly as a percentage of assets under management, according to the blended fee schedule below:

Assets under Management	Annual Fee (%)
The first \$150,000	1.50%
The next \$100,000	0.70%
\$250,000 to \$500,000	0.60%
\$500,000 to \$1,000,000	0.50%
Over \$1,000,000	0.40%

For example, if a client gives us \$500,000 to manage, the annual fee would be calculated as follows:

1.5% on the \$150,000

0.70% on \$100,000

0.60% on \$250,000

BICC recommends a minimum account size of at least \$50,000; however, this minimum may be negotiable depending on a client's particular circumstances. Clients will be invoiced in advance at the beginning of each quarter based upon the value (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the previous quarter.

BICC may, at its discretion, waive or reduce fees. BICC may group certain related client accounts for the purposes of achieving the minimum account size and annual fee in determining the annualized fee.

Clients' advisory fees will be directly debited in advance at the beginning of each 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 and clients will be invoiced in accordance with the client authorization in the Investment Management Agreement.

BICC and its supervised person(s) do not accept compensation for the sale of securities or other investment products.

GENERAL INFORMATION ON FEES

Negotiability of Advisory Fees and Minimum Requirements

In certain circumstances, all annual fees and account minimums may be negotiable depending on the BICC services, the individual circumstances of a client and the amount of assets to be managed.

Fee Calculation

The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (Section 205(a)(1) of the Advisers Act).

Termination

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days prior written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

Additional expenses and costs

All fees paid to BICC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and exchange traded funds ("ETFs") 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 mutual fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund or ETF directly, without the services of BICC. In that case, the client would not receive the services provided by BICC which are designed, among other things, to assist the client in determining which mutual fund, funds or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by BICC to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

For California Residents: Subsection (j) of Rule 260.238, California Code of Regulations requires that all investment advisers disclose to their advisory clients that lower fees for comparable services may be available from other sources.

Advisory Fees in General

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

ERISA

Bankers Investment Counseling Company ("BICC") is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income Security Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, we may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset our advisory fees.

Brokerage Expenses

In addition to BICC's advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker-dealers, including, but not limited to, any transaction commissions or charges imposed by a broker-dealer with which an independent investment manager effects transactions for the client's account(s).

Under no circumstances will we earn fees in excess of \$500 more than six months in advance of services rendered.

Item 6. Performance-Based Fees and Side-By-Side Management

We do not charge any fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7. Types of Clients

BICC offers and provides a combination of the following advisory services, where appropriate, to individuals, including high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations and/or business entities.

BICC recommends a minimum account size of at least \$50,000; however, this minimum may be negotiable depending on a client's particular circumstances.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Our firm generally employs fundamental and technical analysis methods to formulate client recommendations. Fundamental analysis of a business involves analyzing its income statement, financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis school of thought maintains that markets may mis-price a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mis-priced security and then waiting for the market to recognize its "mistake" and re-price the security. However, unforeseen market conditions and/or company developments may result in

significant price fluctuations that can lead to investor losses.

Technical analysis seeks to identify price patterns and trends in financial markets and attempt to exploit those patterns. We follow and examine such indicators as price, volume, moving averages of the price and market sentiment. Since technical analysis predictions are only extrapolations from historical price patterns, investors bear risk that these patterns will not reoccur as expected.

Quantitative analysis: We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative analysis: We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation: In addition to focusing on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual fund and/or ETF analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to continue or replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less appropriate for the client's portfolio.

Risks for all forms of analysis: Our securities analysis methods rely on the assumption that the companies whose securities we recommend, purchase and sell, the rating

agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are aware that indications, reporting or data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

Item 9. Disciplinary Information

Our firm and our related persons have no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other financial industry affiliations.

BICC does not recommend or select other investments advisers for clients, and BICC does not have any business relationships that create material conflicts of interest.

Item 11. Code of Ethics, Participation in Client Transactions and Personal Trading

BICC has adopted a Code of Ethics consistent with the Advisers Act requirements. BICC's Code of Ethics provides for a high ethical standard of conduct for all BICC's professionals and employees, compliance with federal securities laws, and policies and procedures for the reporting of certain personal securities transactions on a quarterly basis and initial and annual security holdings by BICC's professionals and employees. Among other things, BICC's Code of Ethics also requires the prior approval of any IPO and private placement investments, supervisory reviews, enforcement and recordkeeping. A copy of BICC's Code of Ethics is available to BICC's advisory clients upon written request to the Chief Compliance Officer at BICC's principal address.

BICC, or individuals associated with BICC, maintain personal investment accounts. The investment advice provided to advisory clients and the investment actions taken on behalf of the firm's clients and any officer's or employee's personal account may be similar to or different than the advice given and/or the timing and nature of the actions taken with respect to any advisory client's account. Also, associated persons of BICC may purchase or sell securities in which the firm, or associated persons, directly or indirectly, may have or may acquire a position or interest.

It is the expressed policy of BICC that no person employed by BICC may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts. BICC's policy provides that any personal transactions for any persons associated with BICC may be placed with any advisory client transactions.

As these situations represent a conflict of interest, BICC has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) An officer or employee of BICC shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of BICC shall prefer his or her own interest to that of the advisory client.
- 2) BICC maintains records of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by the President of BICC.
- 3) BICC emphasizes the unrestricted right of the client to select and choose any broker or dealer (except in situations where BICC may be granted discretionary authority).
- 4) BICC requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- 5) Any individual not in observance of the above may be subject to termination.

Item 12. Brokerage Practices

Investment Supervisory Services:

BICC will endeavor to recommend brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of commissions are based on the broker's ability to provide professional services, competitive commission rates, research and other services which will help BICC in providing investment management services to clients. BICC may, therefore recommend a broker-dealer who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Research services may be useful in servicing all our clients, and not all of such research may be useful for the account for which the particular transaction was effected.

Direction of Brokerage

Certain clients, when undertaking an advisory relationship, already have a pre-established relationship with a broker and will instruct BICC to execute all transactions through that broker. In the event that a client directs BICC to use a particular broker or dealer, it should be understood that under those circumstances BICC will not have authority to select the broker-dealer or to negotiate commissions, aggregate those client's transactions with other client orders, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients.

Schwab Institutional Program

BICC recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a registered FINRA broker-dealer and SIPC member, to maintain custody of clients' assets and to effect trades for their accounts. BICC is independently owned and operated and not affiliated with Schwab. Schwab provides BICC with access to its institutional trading and custody services, which are typically not available to Schwab retail investors.

These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets is maintained in accounts at Schwab Institutional, and is not otherwise contingent upon BICC committing to Schwab any specific amount of business. Schwab's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For BICC's client accounts maintained with Schwab, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to BICC other products and services that benefit BICC but may not benefit its clients' accounts. Some of these other products and services assist BICC in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of BICC's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of BICC's accounts, including accounts not maintained at Schwab Institutional.

Schwab Institutional also makes available to BICC other services intended to help BICC manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers.

Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of BICC's personnel. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to BICC by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to BICC.

While as a fiduciary, BICC endeavors to act in its clients' best interests, and BICC's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to BICC of the availability of some of the foregoing products and

services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

BICC generally recommends and uses Schwab for our clients' brokerage and custody services. Clients may select Schwab or a broker-dealer firm of their own choosing.

If a client selects Schwab for custody services without directing BICC to use that firm for brokerage services as well, BICC may exercise its discretion and use that firm for the client's brokerage services. BICC has evaluated Schwab over the years, and will continue to evaluate the services it provides in the future. These services include a blend of execution services, commission costs and professionalism that assists BICC in obtaining quality services including seeking best execution for client transactions. While BICC believes that Schwab provides quality brokerage and custody services, BICC will not be trading or independently seeking best execution price capability through other broker dealers unless the firm determines that other firms may offer a blend of better services. BICC may also on occasion negotiate commissions on behalf of our clients in an effort to obtain competitive commission rates.

BICC reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than Schwab, if BICC believes that this would adversely affect BICC's ability to manage a client's portfolio.

Research and Soft Dollars

As a matter of policy and practice, BICC does not have any formal or informal arrangements or commitments for obtaining research products or services on a soft dollar basis.

Trade Aggregation/Block Trading

BICC will block trades where possible and when advantageous to clients. Blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client 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 may allow us to execute equity trades in a timelier, more-equitable manner, at an average share price. We will typically aggregate trades among clients whose accounts can be traded at a given broker and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day. Our block trading policy and procedures are as follows:

1. Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with BICC or our firm's order allocation policy.
2. The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.

3. The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable BICC to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a “20-20 hindsight” perspective. Best execution includes the duty to seek the best quality of execution as well as the best net price.
4. Prior to entry of an aggregated order, a written order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
5. If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to the pro rata allocation may be made to avoid having odd amounts of shares held in any client account or to avoid excessive ticket charges in smaller accounts.
6. Generally each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order and must share in the commissions on a pro rata basis in proportion to the client’s participation. Under the client’s agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.
7. If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
8. BICC’s client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
9. Funds and securities for aggregated orders are clearly identified on BICC’s records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
10. No client or account will be favored over another.

BICC does not receive referrals from any broker-dealers or third parties.

Item 13. Review of Accounts

Reviews of Accounts

Investment Counseling Services

While the underlying securities within Investment Counseling Services accounts are continuously monitored, these accounts are reviewed on a more formal basis at least quarterly by Andrew H. Killion, President. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. Changes in variables such as market, political or economic circumstances, changes in a client's individual financial objectives or circumstances or a client's request may trigger more frequent reviews.

Client Reports

Investment Counseling Services:

In addition to the monthly statements and confirmations of transactions that Investment Counseling Services clients receive from their broker-dealer, bank, custodian or mutual fund company, BICC may provide quarterly reports, balances and holdings.

Item 14. Client Referrals and Other Compensation

It is BICC's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is BICC's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in connection with the advisory services we provide to our clients.

Item 15. Custody

BICC does not have physical custody of client funds or securities. However, BICC is deemed to have "constructive custody" as a result of our firm's authority from certain clients for BICC to directly debit client advisory fees from their custodian accounts consistent with industry practices and regulatory guidelines.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from the client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Item 16. Investment Discretion

For discretionary clients, BICC requests that it be provided with written authority to determine which securities, the amounts of securities that are bought or sold. BICC does not have the authority to select the broker-dealer to be used or negotiate the commission rates on clients' behalf in an effort to obtain competitive commissions.

Any limitations on BICC's 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.

Item 17. Voting Client Securities***Proxy Voting***

BICC's firm policy and practice is that BICC does not have any authority or responsibility to vote any client proxies.

Advisory clients have expressly retained proxy voting authority for their portfolio securities and accounts and accordingly, BICC has no responsibility and may not take any action regarding the firm's advisory client proxies.

Legal Proceedings

Clients should note that BICC may not provide legal counsel or advise or act on behalf of any clients in legal proceedings e.g., class actions, bankruptcies or other legal proceedings, involving companies whose securities are held or previously were held in client portfolios, including, but not limited to, the filing of "Proofs of Claim" in class action settlements. BICC may provide support or assistance for client filings.

Item 18. Financial Information

Under no circumstances will BICC charge or earn fees in excess of \$500 more than six months in advance of services rendered.

BICC and its Principal have no financial events or proceedings to disclose.

Item 19. Requirements for State-Registered Advisers

The following individual is the principal executive officer and management person of Bankers Investment Counseling Company:

- Andrew H. Killion, President & Chief Investment Officer
- Christina K. Killion, Silent Partner

Information regarding their formal education and business background appears below.

Andrew H. Killion

Education:

- B.S. in Business Administration, The California Maritime Academy, 1991

Business Background:

- President, Bankers Investment Counseling Company, February 2022 – Present; Owner 06/2023 – Present.
- Owner/Managing Member, Anchors Way Advisors, LLC, March 2023 – Present
- Sole Proprietor, Andy Killion Marine Surveyor, January 2015 – March 2023
- Vice President, Bankers Investment Counseling Company, August 2019 – February 2022
- Financial Advisor, Merrill Lynch, December 2015-July 2019
- Program Manager, MAR Inc-October 2013-February 2015
- President, Anchors Way Marine Centers. June 2005-July 2013
- Financial Advisor, Morgan Stanley, February 1993-June 2005

Christina K. Killion

Education:

- Buena H.S., Ventura, CA, Graduated 1986

Business Background:

- Silent Partner/Shareholder, Bankers Investment Counseling Company, 06/2023 – Present
- Inogen, Inc., Senior Manager, AP/Payroll, 09/2014 - Present

Bankers Investment Counseling Company is not engaged in any business activity other than giving investment advice.

Neither Bankers Investment Counseling Company nor our supervised persons are compensated for advisory services with performance-based fees.

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory or administrative proceedings in which our firm or management personnel were found liable or against whom an award was granted. Our firm and management person have no reportable disciplinary events to disclose.

Neither Bankers Investment Counseling Company nor our management person has a relationship or arrangement with any issuer of securities.

Business Continuity Plan: BICC has a Business Continuity Plan (BCP) that identifies procedures relating to an emergency or significant business disruption, including death

or incapacitation of the firm's owner and investment adviser representative, and has been reasonably designed to enable our firm and its representative(s) to meet their fiduciary obligations to clients.

Part 2B of Form ADV: *Brochure Supplement*

Andrew H. Killion

BANKERS INVESTMENT COUNSELING COMPANY

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February 22, 2024

This brochure supplement provides information about Andrew H. Killion that supplements the Bankers Investment Counseling Company firm brochure. You should have received a copy of that brochure. Please contact Andrew H. Killion if you did not receive Bankers Investment Counseling Company's brochure or if you have any questions about the contents of this supplement.

Additional information about Andrew H. Killion is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Andrew H. Killion's CRD number is 2307056.

Item 2. Educational Background and Business Experience

Andrew H. Killion, President and Chief Investment Officer **Year of Birth:** 1967

Education:

Mr. Killion graduated from The California Maritime Academy in 1991 with a Bachelor of Science in Business Administration.

Business Background:

- President, Bankers Investment Counseling Company, February 2022 – Present; Owner, 06/2023 – Present.
- Owner/Managing Member, Anchors Way Advisors, LLC, March 2023 – Present
- Sole Proprietor, Andy Killion Marine Surveyor, January 2015 – March 2023
- Vice President, Bankers Investment Counseling Company, August 2019 – February 2022
- Financial Advisor, Merrill Lynch, December 2015-July 2019
- Program Manager, MAR Inc., October 2013-February 2015
- President, Anchors Way Marine Centers. June 2005-July 2013
- Financial Advisor, Morgan Stanley, February 1993-June 2005

Item 3. Disciplinary Information

Mr. Killion does not have any history of disciplinary events.

Item 4. Other Business Activities

Mr. Killion is an Accredited Marine Surveyor. He inspects vessels for standardized compliance, condition and valuation. This activity is not investment related.

Item 5. Additional Compensation

Mr. Killion does not receive any compensation from third parties in connection with providing advisory services to clients.

Item 6. Supervision

As President and Chief Investment Officer of Bankers Investment Counseling Company, Andrew H. Killion is solely responsible for all supervision, formulation and monitoring of investment advice offered to clients. Mr. Killion reviews and oversees all material investment policy changes and conducts periodic testing to ensure that client objectives and mandates are being met.

Item 7. Requirements for State-Registered Advisers

A petition for Chapter 7 bankruptcy was filed by Mr. Killion June 12, 2015 and was subsequently discharged October 27, 2015.

Andrew Killion has not been involved with or found liable in any arbitration hearing, or in a proceeding by a civil, administrative, or self-regulatory body.