



SEASTRUNK FINANCIAL MANAGEMENT, LLC  
CRD #149660

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03/25/2026

**FORM ADV PART 2A BROCHURE**

This Brochure provides information about the qualifications and business practices of Seastrunk Financial Management, LLC. If you have any questions about this Brochure's contents, please contact us at 843-661-0220. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Seastrunk Financial Management, LLC is a registered investment adviser. The registration of an Investment Adviser does not imply any level of skill or training. An Adviser's oral and written communications provide you with information about which you determine to hire or retain an Adviser.

Additional information about Seastrunk Financial Management, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Seastrunk Financial Management, LLC is 149660.

**Item 2 – Material Changes**

**Item 2- Material Changes**

There are no material changes to this year's annual amendment.

Clients with questions may contact us at (843-661-0220) or the address on the front of this Brochure.

### Item 3 -Table of Contents

Item 2- Material Changes.....	ii
Item 3 -Table of Contents .....	iii
Item 4 – Advisory Business.....	1
General Description of Services .....	1
Guidance/Financial Planning Services.....	4
Reasonable Restrictions, Pledging and Withdrawing Securities .....	8
Item 5 – Fees and Compensation.....	8
Item 6 – Performance-Based Fees and Side-By-Side Management .....	13
Item 7 – Types of Clients.....	14
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	14
Item 9 – Disciplinary Information.....	15
Item 10 – Other Financial Industry Activities and Affiliations.....	16
Item 11 – Code of Ethics .....	16
Item 12 – Brokerage Practices .....	19
Item 13 – Review of Accounts.....	21
Item 14 – <i>Client</i> Referrals and Other Compensation .....	22
Item 15 – Custody.....	22
Item 16 – Investment Discretion.....	22
Item 17 – Voting <i>Client</i> Securities .....	23
Item 18 – Financial Information.....	23
Item 19 – Requirements for State-Registered Advisers.....	24
Brochure Supplement(s)	

## Item 4 – Advisory Business

Seastrunk Financial Management, LLC is a Registered Investment Advisor based in Florence, South Carolina, and has been in business since 1994. The core of our company is to offer objective personal financial planning that thoroughly evaluates non-investment-related issues, including retirement, estate planning, education, and family legacies. Our purpose is to help you get answers to your questions and enable you to move towards achieving your financial and life goals.

Conrad E. Seastrunk is the sole owner of Seastrunk Financial Management, LLC. Seastrunk Financial Management, LLC provides Investment Advisory and Financial Planning services that are consistent with individual and business clients' financial and tax status, risk tolerance, and investment objectives.

### General Description of Services

Seastrunk Financial provides wealth counseling and investment management services to its clients based on each Client's individual needs and circumstances. Clients work with Investment Adviser Representatives ("IARs") located in Florence, SC, to assess their individual financial needs, objectives, and capacity for risk. Based on the IARs' review and analysis, they assist with administering services that clients desire. Seastrunk Financial's Client financial planning process typically starts with the Financial Check-up.

There are three general ways that Seastrunk Financial helps Clients meet their objectives:

- 1. Wealth Management (Financial Planning & Investment Management):**  
Seastrunk Financial IARs conduct a risk assessment and analysis of Clients' objectives through Seastrunk Financial's Financial Planning program, making appropriate recommendations on how to help Clients meet their financial needs. IARs then provide recommendations to Clients on how to allocate their investable assets ("Portfolio Construction"), as well as make recommendations relating to the Client's financial life that may not directly relate to the assets that Seastrunk Financial manages on a discretionary basis. With this service, IARs meet with Clients at least annually, and at

times more frequently, to reassess Client objectives and risk tolerances and to recommend and make modifications to Client investments as needed. In this situation, discretionary investment management is executed as described below.

2. **Investment Management, only:** For Clients choosing Seastrunk Financial investment management services only, IARs work with Clients to assess their tolerance for risk and determine a suitable portfolio construction. Once an appropriate portfolio is constructed, a representative of Seastrunk Financial's investment advisor oversees the management of the assets. See below for further information about Seastrunk Financial's investment management services.
3. **Financial planning, only:** Seastrunk Financial's financial Planning program includes IARs assessing Clients' financial needs and providing appropriate recommendations but does not include discretionary investment management.

We may occasionally provide general non-security advice on topics such as tax planning, budgetary planning, estate planning, life insurance analysis, disability insurance analysis, and fringe benefit analysis.

**We offer discretionary portfolio management services that follow your investment objectives.** Services begin by performing an initial analysis of your financial circumstances, investments, goals, and restrictions. An Investment Policy is constructed, with assets diversified across a broad range of asset classes in an attempt to minimize risk. We then provide you with initial investment purchase and sale recommendations, and we select the investment strategies you would like to apply to your account. Thereafter, we will monitor and update your accounts on a continuous basis.

Although we believe that a combination of no-load mutual funds, ETFs, and individual securities currently offer the most effective way to achieve your investment goals, opinions change due to new product innovation, changing market conditions, or changes in your circumstances. Discretionary trading authority enables us to replace a current investment with a new one, once it has been determined that the new investment offers you advantages over the current investment. Such changes are very carefully considered, and they do not happen

frequently. You pay no fees or commissions when we make most changes to mutual funds. However, some ETFs and individual securities incur Fidelity's normal commission schedule. Additionally, there may be a tax implication.

Investment Advisory services are provided on exchange-listed securities, over-the-counter securities and foreign issues, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, variable life insurance, variable annuities, and mutual fund services. Seastrunk Financial Management, LLC occasionally offers investment advice on Options contracts and interests in partnerships investing in real estate and oil and gas.

To implement your Investment Plan, we will manage your investment portfolio on a discretionary or a non-discretionary basis. As a discretionary investment adviser, we can supervise and direct your portfolio without your prior consultation. Under a non-discretionary arrangement, you must be contacted before executing any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of your portfolio. This delay also means that typically the affected account(s) cannot participate in block trades, a practice designed to enhance the execution quality, timing, and/or cost for all accounts included in the block. In a non-discretionary arrangement, you retain the responsibility for the final decision on all actions taken with respect to your portfolio. Notwithstanding the foregoing, you may impose certain written restrictions on us in the management of your investment portfolio, such as prohibiting the inclusion of certain types of investments in your investment portfolio or prohibiting the sale of certain investments held in your account at the commencement of our relationship. You should note, however, that the restrictions you impose may adversely affect the composition and performance of your investment portfolio. You should also note that your investment portfolio is treated individually by considering each purchase or sale for your account. For these and other reasons, the performance of client investment portfolios within the same investment objectives, goals, and/or risk tolerance may differ, and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of our firm.

Seastrunk Financial Management, LLC assets under management as of 03/05/2025 were \$65,622,000.

**Guidance/Financial Planning Services:** We provide financial planning services that vary based on each client's investment objectives and financial circumstances. The specific services provided are determined at contract signing and are described in the Financial Planning Agreement.

### **General Description of Financial Planning Services**

Seastrunk Financial's Financial Planning services generally include, but is not necessarily limited to, the following services (not all services are offered or applicable to all Clients):

- Financial Check-up
- Assess if you are on track to meet your financial life goals.
- Help to identify and understand what motivates your financial decision making.
- Confidential conversations about your financial situation.
- Help to create a clearly defined set of priorities, to help improve financial decisions.
- An online client experience, helping you track your assets and goals, while keeping score of how you are doing.
- A net worth summary
- A portfolio snapshot.
- Financial goals review and analysis
- Priority Action List
- Portfolio construction (recommending appropriate investment strategies)
- Asset allocation recommendations
- Consolidated financial summaries.

**Financial Planning services are also provided through an electronic application called the eMoney Advisor™.** This tool provides clients with a net worth summary, goals and priorities, funding for retirement and other key personal benchmarks all in one place. The tool also provides detailed information of the collaborative Financial Planning exercise results with the Clients conducted with a Seastrunk Financial IAR. The eMoney Advisor™ Center offers a platform for Clients to collaborate with their Financial Planner and receive up-to-date information about their assets and goals.

**When providing a consolidated financial summary of accounts to Clients, the data may contain information about accounts for which Seastrunk Financial does not manage or advise the Client.** As such, no inference should be drawn that Seastrunk Financial serves as the adviser on all securities listed on these consolidated financial summaries. For Client assets that Seastrunk Financial is not granted discretionary authority to manage, it will not actively supervise those assets.

**Seastrunk Financial offers modular planning services** to meet individual Clients' specific needs. These services may include one or more of the following:

- Cash flow management.
- Investment management recommendations for non-supervised assets (i.e., 401k's and 403b's).
- Retirement planning.
- Insurance needs analysis.
- Education planning.
- Estate planning.
- Tax planning (not including tax preparation and filing).
- Divorce planning.

Certain Clients, such as small businesses, may require specialized needs analysis, planning, performance reviews, or other services.

Clients may hire Seastrunk Financial to provide Financial Planning services on a one-time basis or continually until canceled. For ongoing services, with the Client's cooperation, IARs meet with Clients no less than annually to monitor their risk profiles and objectives, updating the financial Planning provided to account for changes. Meetings may occur in person or remotely by telephone or webinar. If Clients choose not to meet with their IAR, financial Planning will attempt to be provided based on information received during prior meetings.

Although Seastrunk Financial generally recommends long-term investment strategies, its IARs may recommend various short-term investment strategies to accommodate certain Client goals or objectives.

Seastrunk Financial provides Financial Planning services for Clients with varying needs and circumstances, which may differ from or contradict the financial Planning it or its IARs may follow in managing their own assets.

**Unless the Client directs explicitly otherwise in their Client Agreement, the Client grants Seastrunk Financial authority to:**

- Use its discretion in determining the types of securities bought and sold and the percent allocation of direct trades to the custodial agent.
- Reallocate the Client's portfolio to align with the Client's investment goals and risk tolerances.
- Rebalance the Client's account periodically to conform to the asset allocation expectations of the individual account.
- Replace the custodial agent if deemed necessary, after obtaining the Client's consent.
- Select the broker-dealer for the execution of securities transactions and
- Deduct investment management fees directly from the Client's account.
- Direct distributions from client's accounts to a first-party registered account where both accounts have the same-named registration.

The frequency and timing of transactions in Client accounts may vary significantly, depending on the investment options chosen. Specific investment strategies offered by Seastrunk Financial are created to limit the amount of trading activity. Other strategies are tactical and adjust depending on micro and macroeconomic indicators. When there is a significant activity, the potential that a wash sale is generated negates the taxable advantage of realizing investment losses from the sale of securities. Other strategies attempt to improve the taxable consequence of the assets invested, using tax loss harvesting and other tax management strategies. When deploying tax loss harvesting and other tax management strategies, Seastrunk Financial does not guarantee the ability to reduce the taxable consequence from managing assets. Further, attempts to reduce the taxable result of a portfolio may cause a disparity in the performance of the managed account, because certain assets may not be sold, when they might have been sold if taxes weren't considered. **Clients are urged to work with their IAR to help choose the investment strategy that best meets their goals and objectives.**

**When executing transactions in Client accounts, as noted above, Seastrunk Financial is typically provided with the discretion to select the broker-dealer for execution of securities transactions.** When deciding the appropriate method for executing transactions, Seastrunk Financial may choose to:

- execute all Client transactions at the same time in a block transaction,
- stage transactions, and/or
- submit each Client's transaction independently.

When trades are placed in a "block," all Client shares in that block are aggregated and provided an average execution price. At times, because of the size of a transaction, Seastrunk Financial, at its discretion, may choose to stage transactions. Staging transactions means that Seastrunk Financial, or its trading agent, will submit the transactions for execution at varying times and/or days. This is done to minimize the price movement of the security attributable to the transaction.

Besides its authority to request the deduction and payment of agreed upon management fees from the Client's account, Seastrunk Financial does not take custody of Client assets.

For implementation, the primary focus is on no-load mutual funds and exchange-traded funds, although individual securities may also be used. The advisor will request current financial status information from the client to determine the client's current and ongoing financial situation.

You retain absolute discretion over the decision to implement our consulting recommendations. You are under no obligation to act on our recommendations. Should you act on any of our recommendations, you are not obligated to implement the recommendations through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm you choose.

Changes in your financial condition, personal circumstances, goals, or general economic conditions may trigger changes to our advice. To the extent that material changes have occurred in your circumstances or goals, or to the extent you seek additional services that address a new project, we will ask you to sign a new Services Agreement.

Consulting advice is based on the financial information you provide to our firm. In providing the contracted services, we are not required to verify any information we receive from you or from your other professionals (e.g. attorney, accountant, etc.) and we are expressly authorized to rely on the information you provide. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

Clients may call at any time during normal business hours to discuss their account, financial situation, or investment needs directly with the planner. They receive transaction confirmations as they occur during the month and a monthly statement of their account from the custodian (Fidelity).

### Reasonable Restrictions, Pledging and Withdrawing Securities

**Clients can place reasonable restrictions on their Financial Planning services, investment management accounts, and the financial planning analysis** Seastrunk Financial provides, including investments in specific securities or types of securities. The Client's IAR reviews requests for such restrictions to ensure they are reasonable and will not impair Seastrunk Financial's ability to manage the account and/or to achieve the investment objectives and goals the Client selects.

Subject to the specific policies and procedures of the custodian for their account, Clients may pledge the securities in their account or withdraw the securities from their account (transfer in-kind to another account or custodian). The client will have a direct and beneficial interest in his or her securities, rather than an undivided interest in a pool of securities.

### Item 5 – Fees and Compensation

**Seastrunk Financial Management, LLC provides fee-only discretionary investment advisory services. These services include** ongoing investment advice and monitoring of securities holdings based on the client's needs.

Fees for Consultation and Financial Plans may be negotiated for special cases; however, retainers and fees for assets managed by Seastrunk Financial Management, LLC are as stated in the published schedule. Fees are not collected

for services to be performed more than six months in advance. Lower or higher fees may be found for comparable services.

The specific way Seastrunk Financial Management, LLC charges asset management fees is established in a client's written agreement with Seastrunk Financial Management, LLC. Seastrunk Financial Management, LLC will generally bill its fees quarterly. Asset Management Fees are calculated each quarter based on the assets under management at the end of each quarter on a graduated basis and deducted from the account by the custodian.

Clients may also elect to be billed directly for fees or authorize Seastrunk Financial Management, LLC to debit fees directly from their accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

We reserve the right to modify our fee schedule thirty days in advance of written notice to you.

<b>COST OF SERVICES SCHEDULE</b>	
<b>Client Assets Under Management (or Assets Under Advisement)</b>	<b>Cost for Financial Management (Discretionary Investment Management)</b>
\$0 to \$600,000	1.00%
\$600,001 to \$1,000,000	0.85%
1,000,001 to 5,000,000	0.50%
5,000,000 +	Negotiable

Seastrunk Financial Management, LLC's fees exclude brokerage commissions, transaction fees, and other related costs and expenses that the client shall incur. Clients may incur certain charges imposed by custodians, brokers, third-party investment, and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees, and commissions are exclusive of and in addition to Seastrunk Financial Management, LLC's fee. Seastrunk Financial Management, LLC shall not receive any portion of these commissions, fees, and costs.

Seastrunk Financial Management, LLC does not have custody of the client's funds or securities. Item 12 further describes Seastrunk Financial Management, LLC's factors in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

One-time custom Financial Plans and Investment Plans are available for a negotiated fee, a minimum fee of \$1,200 each. A retainer of ½ the total fee is due upon acceptance of the Financial Planning Agreement. The balance is due upon delivery of the plan(s). Alternatively, a monthly bank draft subscription is available.

Fees for other consultations are \$150 per hour, payable at the time of service. Lower or higher fees may be found for comparable services.

The client may terminate the Financial Planning Agreement without penalty within five business days of signature or at any time until delivery of the Plan. The Agreement terminates upon delivery of the plan. At this time, no refunds will be made, and the balance remaining is due and payable.

For all services, we have the discretion to negotiate our fees, minimum account size, minimum annual fees, and other terms of each Client's relationship with us, and to negotiate different fees, minimums, or other terms on a client-by-client basis. When considering these matters, we usually consider the amount of assets to be placed under management by the client and related accounts, anticipated

future revenues and anticipated future assets or other business from the client or associated persons, and other existing or anticipated relationships. At our discretion, we may elect to aggregate related Client accounts to achieve the minimum account size requirements and determine fees. Because Management Fees and other terms of our programs and services may be negotiated separately with individual clients, some accounts pay lower Management Fees than others. Waivers, discounts, or more favorable terms not generally available to other clients may be offered to family members and friends of our employees and affiliates.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services and
- Give you basic information about conflicts of interest.

## IRA Rollover Considerations

As part of our investment advisory services, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA subject to our management, we will charge you an asset-based fee as outlined in the agreement you executed with our firm. This practice presents a conflict of interest because the people providing investment advice on our behalf have an incentive to recommend a rollover to you to generate fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm. Many employers permit former employees to keep their retirement assets in their company plans. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA and to the extent the following options are available, you should consider the costs and benefits.

An employee will typically have four options:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages, so we encourage you to speak with your CPA and/or tax attorney before making a change.

If you are considering rolling over your retirement funds to an IRA for us to manage, here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you should consider other types of investments.
  - a. Employer retirement plans generally have a more limited investment menu than IRAs.

- b. Employer retirement plans may offer unique investment options not available to the public, such as employer securities or previously closed funds.
2. Your current plan may have lower fees than our fees. Suppose you are interested in investing only in mutual funds. In that case, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
  3. Our strategy may have higher or lower risk than your employer's plan's option(s).
  4. Your current plan may also offer financial advice.
  5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
  6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
    - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules, so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
  7. IRA assets can be accessed at any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception, such as disability, higher education expenses, or the purchase of a home.
  8. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
  9. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name. It is important that you understand the differences between these types of accounts and decide whether a rollover is best for you. Prior to proceeding, if you have questions, contact your investment adviser representative or call our main number, which is listed on the cover page of this brochure.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Seastrunk Financial Management, LLC does not charge performance-based fees (fees based on a share of a client's capital gains on or capital appreciation of assets).

## **Item 7 – Types of Clients**

Seastrunk Financial Management, LLC typically provides financial planning services and portfolio management services to individuals, high net worth individuals, Trusts and Estates.

Most of our clients have multiple accounts. These include joint accounts for married couples, IRA accounts for him and her, trust accounts and even custodial accounts for the kids. The total value for all your combined accounts should be \$100,000 or more (you can start with a smaller amount if you intend to add additional funds relatively soon). Provided you meet this overall minimum, any of your accounts can be as small as \$3,000.

Our clients are usually:

- **Entering retirement and want to minimize income taxes on pension income and social security income and avoid penalties for 401k/IRA withdrawals.**
- **People who are entering retirement or have been laid off and suddenly need to know their options for tapping retirement accounts for income or help to roll over and invest their 401k money.**
- **People going through a divorce or after the death of a spouse who “used to handle all the financial stuff.”**
- **Busy executives and professionals** without time to properly manage and plan their finances.
- **People in mid-life and parents who are struggling to tackle goals such as their children’s education and their own future retirement.**

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

**Investing in securities involves risk of loss that clients should be prepared to bear.**

**We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot guarantee or promise that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.**

Seastrunk Financial Management, LLC, evaluates investment portfolios primarily using fundamental financial analysis. This analysis is based on conventional financial statements and measures of value such as dividend yields, price to earnings, price to sales, and price to cash flow ratios.

Typical sources of information are annual reports, prospectuses, filings with the Securities and Exchange Commission, press releases, and research materials provided by others such as Value Line, Morningstar, and Standard and Poor's. Financial publications such as Reuters, The Wall Street Journal, Barron's, and trade journals are relied upon for market and economic information.

Our investment strategies and advice may vary depending on each client's specific financial situation. As such, we determine investments and allocations based on your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may also affect the composition of your portfolio.

As a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will use the FIFO accounting method to calculate the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is right for you.

If your tax advisor believes another accounting method is best, please provide written notice to our firm immediately, and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost-basis accounting methods will need to be made before trades settle, as the cost-basis method cannot be changed after settlement.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Seastrunk Financial Management, LLC or the integrity of Seastrunk Financial Management, LLC's management. Seastrunk Financial Management, LLC, Conrad E. Seastrunk or Conrad Eric Seastrunk, Jr has no legal or disciplinary events to disclose.

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

Seastrunk Financial Management, LLC, prepares personal income tax returns as part of an overall financial management service. A large majority of Tax Preparation Clients are also Investment Advisory Clients. At times, Seastrunk Financial Management, LLC may pay for tax filings or related fees for these clients and be reimbursed either by check or by a request from the advisory client to debit their account directly. **Tax services are separate and optional; advisory clients are not required to use them, and fees are separate from advisory fees.**

### **Item 11 – Code of Ethics**

Seastrunk Financial Management, LLC has adopted the CERTIFIED FINANCIAL PLANNER® Board's Code of Ethics and Professional Responsibility.

Additionally, Seastrunk Financial Management, LLC and its related persons attempt to avoid conflicts of interest that may arise as a result of the management of its clients' portfolios. From time to time, however, Seastrunk Financial Management, LLC may recommend or cause a client to invest in or hold a security in which the Firm or a related person has an ownership position. Similarly, Seastrunk Financial Management, LLC or a related person may purchase or sell a security of the same class of securities held in a client account or recommended for purchase or sale by the Firm. Seastrunk Financial Management, LLC has adopted policies and procedures and a Code of Ethics to

prevent related persons from benefiting from any price movement caused by client transactions or the Firm's recommendations regarding such securities.

Seastrunk Financial Management, LLC will provide a copy of our Code of Ethics to any client or prospective client upon request.

Seastrunk Financial Management, LLC obtains information from various publicly available sources. It has no sources of inside or private information and does not claim to have any.

The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Seastrunk Financial Management, LLC must acknowledge the terms of the Code of Ethics annually, or as amended.

Seastrunk Financial Management, LLC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Seastrunk Financial Management, LLC has management authority to effect and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Seastrunk Financial Management, LLC, its affiliates and/or clients, directly or indirectly, have a position of interest. Seastrunk Financial Management, LLC's employees and persons associated with Seastrunk Financial Management, LLC must follow Seastrunk Financial Management, LLC's Code of Ethics.

Subject to satisfying this policy and applicable laws, officers, directors and employees of Seastrunk Financial Management, LLC and its affiliates may trade for their accounts in securities recommended to and/or purchased for Seastrunk Financial Management, LLC's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of Seastrunk Financial Management, LLC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their accounts. Under the

Code, certain classes of securities have been designated as exempt transactions based upon a determination that these would materially not interfere with the best interests of Seastrunk Financial Management, LLC's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics, in some circumstances, would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between Seastrunk Financial Management, LLC and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Seastrunk Financial Management, LLC's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Seastrunk Financial Management, LLC will retain records of the trade order (specifying each participating account) and its allocation, which will be completed before the entry of the aggregated order. Completed orders will be allocated as defined in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained in the Order.

Seastrunk Financial Management, LLC's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Conrad Seastrunk at 843-661-0220.

It is Seastrunk Financial Management, LLC's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Seastrunk Financial Management, LLC will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a

transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

## Item 12 – Brokerage Practices

As your financial advisor, you expect us to make thoughtful, carefully researched decisions and consider your best interests. We use a similar approach when we choose the service providers we employ to help us meet your financial objectives.

As a result, we have selected Fidelity Investments to be our custodian for the investments that you entrust to Seastrunk Financial Management, LLC are placed in custody with Fidelity’s clearing firm, National Financial Services LLC (“NFS”). Securities in accounts carried by NFS are protected by the Securities Investor Protection Corporation (“SIPC”) up to \$500,000 (including cash claims limited to \$100,000). For details, please see [www.sipc.org](http://www.sipc.org). Seastrunk Financial Management is not affiliated with Fidelity or any other broker.

Many of our clients have accounts with balances greater than the coverage provided by the SIPC, so National Financial Services LLC arranged for additional protection for cash and covered securities to supplement its SIPC coverage. This additional protection covers total account net equity greater than the \$500,000/\$100,000 coverage provided by SIPC. Neither coverage protects against a decline in the market value of securities.

We recommend Fidelity as custodian based on a range of factors including services, technology, and execution capabilities. While lower-cost alternatives may be available, we believe the overall value supports our duty to seek best execution.

The investment world is complicated enough without keeping track of transactions, capital gains and losses, and so on — especially at tax time. Through our relationship with Fidelity, you will receive a simplified, consolidated

statement each month that reflects all your investment positions, transactions, and realized gains and losses on your trades. At the end of the year, you will receive one 1099 tax form and a summary statement, making preparing your tax return much more manageable.

Commissions and execution of securities transactions implemented through FIDELITY may not be better than commissions or execution available if you used another brokerage firm. However, we believe that the overall level of services and support provided to our clients by FIDELITY outweighs the potentially lower costs that may be available from other brokerage service providers.

You should be aware that there is no direct link between our firm and FIDELITY regarding the advice you receive under our advisory programs. We receive economic benefits through the account custody and operating relationships with FIDELITY that are not typically available to retail investors.

These benefits include the following products and services provided to our firm without cost or at a discount. These benefits create a conflict of interest because they provide an incentive to recommend Fidelity as custodian.

- duplicate client statements and confirmations,
- research related products and tools,
- consulting services,
- access to a trading desk serving Representatives,
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares directly to or from client accounts),
- the ability to have advisory fees deducted directly from client accounts,
- access to an electronic communications network for client order entry and account information,
- access to mutual funds with no transaction fees, and discounts or no fees on compliance, marketing, research, technology, and practice management products and services provided by third-party vendors. These research and brokerage services presently include services such as its Wealth Central Platform with trading tools and research, including, but not limited to Bond Trader Pro, Standard & Poor's, Argus, Decision Economics, Zack's MarketGrader and Morningstar, and are used by our firm to manage accounts for which we have investment discretion.

Seastrunk Financial Management, LLC does not participate in any soft dollar arrangements. A “soft dollar arrangement” is one in which the investment manager directs the commission generated by a transaction to a third party or in-house party in exchange for services that benefit the investment manager’s clients but are not client-directed. Soft dollars, in contrast to hard dollars (actual cash that must be reported), are incorporated into brokerage fees and paid expenses and may not be reported directly. In those instances where we believe it is in the best interests of a client to do so, we will “block” (combine) our client’s orders with those of other clients having similar orders for the purpose of obtaining an advantageous average price for all accounts participating in the block. Any decision not to block a transaction with those of other clients is based on our determination that it is more beneficial to time transactions for each client’s account individually.

We do not process transactions through FIDELITY in return for new client referrals from FIDELITY.

### **Item 13 – Review of Accounts**

Financial Planning clients receive the initial financial plan at the time of service. They are encouraged to have quarterly or annual reviews of the Plan. However, it is the client's responsibility to update their plan, as no ongoing reviews are performed unless the client retains Seastrunk Financial Management, LLC on an annual basis under a separate agreement.

The custodian will send monthly brokerage statements and Seastrunk Financial Management will send quarterly performance reports to clients with assets under Management.

A monthly review of brokerage statements and a quarterly review of all client accounts with assets under management is performed by Conrad E. Seastrunk, CFP®. Significant market adjustments or economic news may cause a more frequent review. Clients with assets under management will receive a quarterly Portfolio Analysis Report from Seastrunk Financial Management, LLC. All clients

with an Asset Management agreement will receive quarterly invoices reflecting the advisory fee paid and the fee calculation.

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

Seastrunk Financial Management, LLC is “fee-only” and does not have an arrangement for receiving compensation for client referrals.

#### **Item 15 – Custody**

Seastrunk Financial Management, LLC does not have full custody of advisory client funds or securities. Client funds or securities are held by a custodian, which is a broker-dealer, bank, or other qualified custodian that holds and maintains the client’s investment assets. We are deemed to have limited custody solely because we deduct advisory fees directly from client accounts.

Clients should receive at least quarterly statements from the broker dealer, bank, or other qualified custodian that holds and maintains the client’s investment assets. Seastrunk Financial Management, LLC urges you to carefully review such statements and compare such official custodial records to the account statements we may provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

If you have a question regarding your account statement or if you did not receive a statement from your custodian, please get in touch with your custodian directly.

#### **Item 16 – Investment Discretion**

We will exercise discretionary trading authority while providing Investment Management Services. (Discretionary authority is not used when we provide Consulting Services.) Granting discretionary authority allows our firm to purchase and sell securities of our choice in the amounts and at the times we believe it is suitable for your account without obtaining your consent on each transaction. Seastrunk Financial Management, LLC usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for

the particular client account.

When selecting securities and determining amounts, Seastrunk Financial Management, LLC observes the investment policies, limitations, and restrictions of the clients it advises. For registered investment companies, Seastrunk Financial Management, LLC's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Seastrunk Financial Management, LLC in writing.

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

As a matter of firm policy and practice, Seastrunk Financial Management, LLC has no authority to and does not vote proxies on behalf of advisory clients. Clients are responsible for receiving and voting proxies for all securities maintained in client portfolios. Seastrunk Financial Management, LLC may advise clients regarding the clients' voting of proxies.

Also, we do not take any action on legal notices we (or a client) may receive from issuers of securities held in your managed account. However, we are available to answer questions regarding such notices.

#### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with specific financial information or disclosures about Seastrunk Financial Management, LLC's financial condition. We do not receive fees of more than \$500 six months or more in advance, thus we are not required to provide financial information to our clients. Seastrunk Financial Management, LLC has no financial commitment that impairs its ability to meet contractual and fiduciary obligations to clients, and has not been the subject of a bankruptcy proceeding.

## Item 19 – Requirements for State-Registered Advisers

- *Background Information.* For background information about management personnel—those giving advice on behalf of our firm —see the attached Schedule(s) 2.B.
- *Other Business.* We are not engaged in any business not described in this brochure and have no relationship with any securities issuer.
- *Legal Events.* Neither our firm nor its management persons has been involved with (1) any arbitration claim of any kind; (2) any self-regulatory organization or administrative proceeding of any kind.