



Seastrunk

FINANCIAL MANAGEMENT

SEASTRUNK FINANCIAL MANAGEMENT, LLC
CRD #149660

121 S Cashua Dr.
Florence, SC 29501

Telephone: 843-661-0220
Fax: 843-661-0977

www.SeastrunkFinancial.com

04/26/2020

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 the contents of this Brochure, 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 by any state securities authority.

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

Additional information about Seastrunk Financial Management, LLC also 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 Seastrunk Financial Management, LLC is 149660.

Item 2 – Material Changes

Item 2- Material Changes

This disclosure dated April 26, 2020 is a Disclosure Brochure ("Brochure"). It was prepared by Seastrunk Financial Management, LLC in response to a rule that was implemented by the United States Securities and Exchange Commission (the "SEC") and The SC Securities Division that apply to registered investment advisers.

Item 5 Page 10: The fee for a modular or flat fee financial plan increased to \$1200.

One-time custom Financial Plan and Investment Plans are available for a negotiated fee 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). Alternately, a monthly bank draft subscription is available.

Clients with questions may contact their Representative or our Chief Compliance Officer or Management at (843-661-0220) or at the address shown on the front of this Brochure.

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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 business is to offer objective personal financial planning that provides a thorough evaluation of 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 consistent with individual and business clients financial and tax status as well as 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, the IARs assist with administering services desired by Clients. 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, the management of the assets is overseen by Seastrunk Financial investment advisor representative. See below for further information about Seastrunk Financial's investment management services.
3. **Financial planning, only:** The Financial Planning program offered by Seastrunk Financial includes IARs' assessing Clients' financial needs and providing appropriate recommendations but does not include discretionary investment management.

We may on occasion provide general non securities advice on topics which may include tax planning, budgetary planning, estate planning, life insurance analysis, disability insurance analysis and fringe benefit analysis.

We offer discretionary portfolio management services in accordance with your individual 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 applied to your account. Thereafter, we will monitor and update your accounts on a continuous basis.

Although we believe that combination of no-load mutual funds, ETFs and individual securities currently offer the most effective way for you to achieve your investment goals, opinions change due to new product innovation, changing market conditions or changes in your personal 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 ETF's 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. Occasionally, Seastrunk Financial Management, LLC will offer investment advice on Options contracts and interests in partnerships investing in real estate and oil and gas interests.

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, in an effort 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 results of the collaborative Financial Planning exercise with 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, data included 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 designed 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, for example, that are small businesses may require specialized needs analyses, planning, or business 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 Clients 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 performs Financial Planning services for Clients with varying needs and circumstances, which may differ from, or contradict, financial Planning it or its IARs may follow in the management of their own assets.

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

- Use its discretion in determining the types of securities bought and sold, along with the percent allocation direct trades to the custodial agent
- Reallocate the Client's portfolio to keep it in line 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 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. Certain 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 significant activity, the potential that a wash sale is generated, negating the taxable advantage of realizing investment losses from sale of securities. Other strategies attempt to improve the taxable consequence of the assets invested, through the use of 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 consequence 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 as part of 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.

Other than 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. 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 choose to 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 of your choice.

Changes in your financial condition, personal circumstances, goals, or general economic conditions may trigger changes to the advice we provide. 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 in at any time during normal business hours to discuss directly with the planner the client's account, financial situation, or investment needs. Clients receive transaction confirmations as they may occur during a month, and receive a monthly statement of their account from the custodian (Fidelity).

[Reasonable Restrictions, Pledging and Withdrawing Securities](#)

Clients have the option to place reasonable restrictions on their Financial Planning services, investment management accounts, and on the financial planning analysis Seastrunk Financial provides, including investments in specific securities or types of securities. Requests for such restrictions are reviewed by the Client's IAR 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.

Seastrunk Financial Management, LLC assets under management as of 03/18/2019 was \$25,084,934.20

Item 5 – Fees and Compensation

Seastrunk Financial Management, LLC provides fee-only discretionary investment advisory services, providing ongoing investment advice and monitoring of securities holdings based on the individual needs of the client.

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 per 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 asset management fees are charged by Seastrunk Financial Management, LLC is established in a client's written agreement with Seastrunk Financial Management, LLC. Seastrunk Financial Management, LLC will generally bill its fees on a quarterly basis. Asset Management Fees are calculated each quarter based on the assets under management at the beginning 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 to authorize Seastrunk Financial Management, LLC to directly debit fees from client 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 upon thirty days advance written notice to you.

COST OF SERVICES SCHEDULE		
Client Assets Under Management (or Assets Under Advisement for Financial Guidance Only)	Cost for Financial Management (Discretionary Investment Management & Financial Guidance)	Cost for Discretionary Investment Management Only
\$0 to \$150,000	1.25%	1.00%
\$150,001 to 500,000	1.00%	1.00%
\$500,001 to \$1,000,000	0.85%	0.70%
1,000,001 to 5,000,000	0.50%	0.40%
5000000 +	Negotiable	

Seastrunk Financial Management, LLC's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. 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, and Seastrunk Financial Management, LLC shall not receive any portion of these commissions, fees, and costs.

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

One-time custom Financial Plan and Investment Plans are available for a negotiated fee 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). Alternately, a monthly bank draft subscription is available.

Fees for other consultation are computed at an hourly rate of \$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 Financial Planning 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 related persons, and other existing or anticipated relationships. We may elect, in our discretion, to aggregate related Client accounts for the purpose of achieving the minimum account size requirements and determining 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 other accounts. 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.

IRA Rollover Considerations

As part of our investment advisory services to you, 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 that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating 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 do 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 plan. 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 of: 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 and before making a change we encourage you to speak with your CPA and/or tax attorney.

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 might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have 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. If you are interested in investing only in mutual funds, 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.

- b. 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 the option(s) provided to you in your plan.
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 with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. IRA assets can be accessed 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 to 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 as 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 capital gains on or capital appreciation of the assets of a client).

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 of 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, social security income and avoid penalties 401k/IRA withdrawals.**
- People that are **entering retirement** or been laid off and suddenly need to know their options for tapping retirement accounts for income or help rolling over and investing their 401k money.
- **People going through divorce or after the death of a spouse that “used to handle all the financial stuff”.**
- Busy executives and professionals who do not have the time to properly manage and plan their personal finances.
- **People in mid-life and parents 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 offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Seastrunk Financial Management, LLC relies primarily on fundamental financial analysis to evaluate investment portfolios. This analysis is based upon 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 obtained from 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, as well as trade journals, are relied upon for market and economic information.

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

Resulting from 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 for calculating 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 other fees related to tax filings for these clients and be reimbursed either through check or a request from the advisory client to directly debit their account.

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 intended to prevent related persons from benefiting from any price movement that may be 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 a wide variety of publicly available sources. Seastrunk Financial Management, LLC has none, and does not claim to have, sources of inside or private information.

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 are required to 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 own accounts in securities which are 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 own 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 interest 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, and 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 prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on 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 own 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 to keep your best interests in mind. We use a similar approach when we make decisions about 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 in accordance with the Securities Investor Protection Corporation ("**SIPC**") up to \$500,000 (including cash claims limited to \$100,000). For details, please see www.sipc.org. Seastrunk Financial Management is not affiliated with Fidelity or any other broker.

Many of our clients have accounts with balances in excess of 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 in excess of the \$500,000/\$100,000 coverage provided by SIPC. Neither coverage protects against a decline in the market value of securities.

With one of the largest mutual fund supermarkets in the industry, working with Fidelity enables us to select what we think are the best investments for your portfolio, from more than 5,600 mutual funds from over 400 fund families. With a singular focus on best execution, Fidelity Capital Markets offers significant liquidity from a strong order flow pool, providing access to better prices and better information.

The investment world is complicated enough without having to keep 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 of 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, which can make preparing your tax return a lot easier.

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 in connection with the advice you receive under our advisory programs. We receive economic benefits through the account custody and operating relationships we have 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:

- 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 are for the benefit of the investment manager's clients, but are not client directed. Soft dollars, in contrast to hard dollars (actual cash which has to 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) the 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 upon our deciding that it is more beneficial to time transactions for the benefit of 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. Financial Planning clients are encouraged to have quarterly or annual reviews of the Plan. It is, however, the client's responsibility to update their plan, as no on-going reviews are performed unless client retains Seastrunk Financial Management, LLC on an annual basis under a separate agreement.

Clients who have assets under management will receive monthly brokerage statements and quarterly performance reports from Seastrunk Financial Management, LLC.

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®. Large 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 calculation of the fee.

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 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 client’s investment assets.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains 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 that we may provide to you. 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 contact 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 for which 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 does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Seastrunk Financial Management, LLC may provide advice to 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 certain 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 commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

- *Background Information.* See the attached Schedule(s) 2.B for background information about management personnel -- those giving advice on behalf of our firm.

- *Other Business.* We are not engaged in any business not described in this brochure, and have no relationship with any issuer of securities.
- *Legal Events.* Neither our firm nor any of 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.

Item 1- Cover Page



Conrad E. Seastrunk, CFP®
CRD # 1889535

SEASTRUNK FINANCIAL MANAGEMENT, LLC
CRD #149660

121 S. CASHUA DR.
FLORENCE, SC
843-661-0220

www.SeastrunkFinancial.com

APRIL, 26 2020

This Brochure Supplement provides information about Conrad E. Seastrunk, CFP® that supplements the Seastrunk Financial Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Mr. Seastrunk if you did not receive Seastrunk Financial Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Conrad E. Seastrunk (CRD # 1889535) is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2- EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Conrad E. Seastrunk, CFP®
D.O.B. July 14, 1964

Education:

- Francis Marion College - Florence, SC: Bachelor of Business Administration - 1988
- College For Financial Planning, Denver, CO - Certified Financial Planner Education Program - 2000

Professional Credential:

CFP® : CERTIFIED FINANCIAL PLANNER™

CFP® Certificants must pass the comprehensive CFP® Certification Examination, pass CFP Board's *Fitness Standards for Candidates and Registrants*, agree to abide by CFP Board's *Code of Ethics and Professional Responsibility* which puts clients' interests first, and comply with the *Financial Planning Practice Standards* which spell out what clients should be able to reasonably expect from the financial planning engagement. And complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field.

Business Background:

- James H. Rice, CFP® & Associates 1988 – 1990: Conrad began his career working as a Series 7 Registered Representative of Source Securities, Inc and an Investment Advisor Representative of James H. Rice, CFP® & Associates.
- NYlife Advisors, Inc. 1990 – 1994: Investment Advisor Representative
- New York Life 1990 - 1994: Insurance Agent
- NYlife Securities 1990 – 1994: Registered Representative

- D.B.A. Seastrunk Financial Management Co. 1994 – 2009: Registered Investment Advisor
- Seastrunk Financial Management, LLC 2009 – Present: Investment Advisor Representative

ITEM 3- DISCIPLINARY INFORMATION

Conrad Seastrunk does not have any disciplinary information to disclose. He has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority; or (c) been party to a self-regulatory proceeding.

ITEM 4- OTHER BUSINESS ACTIVITIES

Conrad Seastrunk is not actively engaged in any other business activities.

ITEM 5- ADDITIONAL COMPENSATION

Conrad Seastrunk does not receive any additional economic benefit from third parties for providing advisory services.

ITEM 6 - SUPERVISION

Conrad Seastrunk is the Chief Compliance Officer for Seastrunk Financial Management, LLC and is responsible for following all applicable laws concerning advisory activities.

ITEM 7- REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Conrad Seastrunk has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500; (b) any civil, self-regulatory organization, or administrative proceeding; or (c) a bankruptcy petition.

Item 1- Cover Page



Conrad Eric Seastrunk, Jr

CRD # 6749813

SEASTRUNK FINANCIAL MANAGEMENT, LLC

CRD #149660

121 S. CASHUA DR.

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APRIL, 26 2020

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Additional information about Conrad E. Seastrunk, Jr. (CRD # 6749813) is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2- EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Conrad Eric Seastrunk, Jr
D.O.B. January 13th, 1993

Education:

- Francis Marion University – Florence, SC: Bachelor of Business Administration in Finance - 2016

Business Background:

- Seastrunk Financial Management, LLC 2017 – Present: Investment Advisor Representative

ITEM 3- DISCIPLINARY INFORMATION

Conrad E. Seastrunk, Jr. does not have any disciplinary information to disclose. He has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority; or (c) been party to a self-regulatory proceeding.

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