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Firm Brochure

(Part 2A of Form ADV)

January 24, 2025

This brochure provides information about the qualifications, business practices, and nature of services of Sea Clear Financial Planning, LLC. The contents of this brochure have not been approved or verified by the Securities and Exchange Commission (SEC), or any other state or federal authority. While the firm is an investment adviser registered with the state of New Jersey, such registration does not imply a certain level of skill or training on the part of the firm or its associated personnel. Additional information about the firm is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>. Sea Clear Financial Planning, LLC's CRD number is 160133. If you have any questions about the contents of this brochure, please contact Sea Clear Financial Planning, LLC by telephone at (732) 580- 8039.

Item 2: Material Changes

The Material Changes in this brochure, from the last annual amendment dated August 27, 2024, relating to Sea Clear Financial Planning's policies, practices or conflicts of interests, are described below.

Item 5: The Comprehensive Financial Planning Fee & Comprehensive Financial Planning & Investment Management Fee schedule has been updated.

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Item 4: Advisory Business

A. Firm Description

Sea Clear Financial Planning, LLC ("Sea Clear Financial Planning" or "we" or "us" or "firm") was founded in 2011.

Sea Clear Financial Planning provides personalized confidential financial planning and investment management services primarily to individuals and families. Advice is provided through consultation with the client and may include but is not limited to: a review of financial goals and objectives, identification of financial problems, cash flow analysis, insurance review, education planning, tax planning, portfolio review, investment management, retirement planning, and estate planning.

The firm adheres to a fiduciary standard, which means Sea Clear Financial Planning and its associates will act in good faith and in the best interest of its client.

Sea Clear Financial Planning is strictly a fee-only financial planning and investment management firm. This means that the firm will be compensated solely with fees paid by its clients. Sea Clear Financial Planning does not sell any products such as annuities or insurance, receive any commissions, or collect any other type of compensation from third parties. Instead, the firm's compensation is based on fixed or hourly fees for financial planning, and a percentage of client's assets under management for investment management services (please see Item 5 for a complete discussion of Fees and Compensation).

An initial complimentary meeting is conducted by the managing member of the firm with the prospective client, to determine the scope of services to be provided. This initial meeting may take place in person or over the telephone, and is intended to help determine whether financial planning and/or investment management services may be beneficial to the prospective client. A current ADV Part 2 brochure and the firm's Privacy Policy, will be given to the prospective client at the time services are engaged by the client through contract execution.

Should the prospective client wish to engage Sea Clear Financial Planning for its services, the prospective client and the firm must enter into a written agreement.

Principal Owners

Kelly L. Trageser, MBA, CFP[®] is a 100% owner and managing member.

B. Types of Advisory Services

Comprehensive Financial Planning

Comprehensive financial planning may include but is not limited to: a review of financial goals and objectives, identification of financial concerns, a cash flow analysis, an insurance review, a portfolio review, education planning, tax planning, retirement planning, and estate planning. The Comprehensive Financial Plan does not include Retirement Plan Advisement which is recommendations on asset allocations or holding choices in employer sponsored retirement plans. A written financial plan will contain the above stated items along with a summary of the recommendations. The firm will assist the client with the summary of recommendations.

Sea Clear Financial Planning does not provide accounting, legal or property and casualty insurance advice. In the event that the financial plan calls for another professional to be engaged, such as an attorney, accountant or insurance agent, the client will engage that professional directly. If Sea Clear Financial Planning, recommends a particular professional to the client, the client is under no obligation to engage that professional. The client should be aware that the other professionals may bill them separately for their services and these fees will be in addition to those of the firm.

Sea Clear Financial Planning may recommend portfolios the firm offers through Morningstar Investment Services ("MIS"), a Third Party Investment Manager. The client is under no obligation to implement any portfolio recommendation. In order for any portfolio recommendation to be implemented, the client must enter into a separate Comprehensive Financial Planning & Investment Management Agreement with Sea Clear Financial Planning where ongoing in-depth financial planning and investment management services are provided.

The efficacy of Sea Clear Financial Planning services is very much dependent upon the cooperation of the client in terms of providing information, communicating goals, concerns, and changes in circumstances. Clients will be asked to provide pertinent financial information. This information may include income, expenses, account statements, insurance documents, tax returns, estate documents and many other items that are helpful to the firm in assessing a client's financial goals. Failure to provide this information relinquishes Sea Clear Financial Planning, LLC of its responsibilities.

It is up to the client to ensure that the information provided to the firm, from whatever source, is accurate and complete. Sea Clear Financial Planning will not independently verify the accuracy or completeness of any information provided by a client that was prepared by another professional.

The Comprehensive Financial Planning Agreement is an annual agreement. Each year the client will be asked to sign a new agreement. The new fee may or may not be the same as the previous year.

Comprehensive Financial Planning and Investment Management

Sea Clear Financial Planning offers in-depth and ongoing comprehensive financial planning and investment management services.

Comprehensive financial planning may include but is not limited to: a review of financial goals and objectives, identification of financial concerns, a cash flow analysis, an insurance review, a portfolio review, education planning, tax planning, retirement planning, and estate planning. A written financial plan will contain the above stated items along with a summary of the recommendations. The firm will assist the client with the summary of recommendations.

Investment management services may include but is not limited to: identifying risk tolerance; reviewing an investment policy statement; recommending a new portfolio; transferring and liquidating the current investment portfolio, implementing the recommended portfolio; rebalancing the investment portfolio and monitoring the investment portfolio. Retirement Plan Advisement includes but is not limited to creating an asset allocation and selecting holdings in current employer participant retirement plans such as 401(K)s, 403(B)s, and 457 Plans. Those assets remain at the current place of business while the client is still employed. Implementation of all recommendations is done by the client.

Sea Clear Financial Planning engages with Morningstar Investment Services ("MIS"), a Third-Party Investment Manager, to implement investment strategies in client accounts. Morningstar Investment Services provides a diverse range of portfolios that are researched, engineered, and monitored. The portfolio chosen by Sea Clear Financial Planning is based on the client's financial profile, goals, time horizon and risk tolerance. Sea Clear Financial Planning works closely with Morningstar Investment Services to implement and monitor the individual portfolios that the firm has recommended for each of its clients.

Written Acknowledgement of Fiduciary Status

When the firm provides investment advice to a client regarding their retirement plan account or individual retirement account, the firm acts as a fiduciary 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 the firm is compensated creates some conflicts with the client's interests, so the firm operates under a special rule that requires the firm to act in the client's best interest and not put the firm's interest ahead of its clients. Under this special rule's provisions, the firm 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.

Limited Scope Engagements

Sea Clear Financial Planning provides hourly planning services for clients who need advice on a limited scope of work. Comprehensive financial plans cannot be completed through an hourly engagement. The scope of each hourly engagement is determined solely by the client. The fee is calculated based on Sea Clear Financials' hourly rate of \$250.00.

C. <u>Client Tailored Advisory Services and Client Imposed Restrictions</u>

Sea Clear Financial Planning tailors their advisory services to the individual needs of clients as described above in Section 4B. Clients may impose restrictions on investing in certain securities or types of securities.

D. Wrap Fee Programs

Sea Clear Financial Planning does not participate in a wrap fee program.

E. Assets Under Management

As of December 31, 2024, Sea Clear Financial Planning managed approximately \$50,910,000 of assets under management on a discretionary basis and \$2,485,000 of assets under advisement.

Item 5: Fees and Compensation

A. Description of Fees

Sea Clear Financial Planning bases its fees on hourly charges, fixed fees and/or a percentage of assets under management. The fee is calculated based on Sea Clear Financial's hourly rate of \$250.00 as well as the anticipated complexity of reviewing and analyzing the client's financial circumstances Current client relationships may exist where the fees are higher or lower than the fee stated below. All clients will be required to execute a written agreement that will describe the type of services to be provided and the fees, among other items. Agreements may not be assigned to another firm without client consent. The firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise determined by the firm's managing member.

Comprehensive Financial Planning Fee

Comprehensive Financial Plans are priced according to the degree of complexity associated with each client's situation and will typically cost \$5,000. The fee for a financial plan is predicated upon the facts known at the start of the engagement. Upon deciding to be a client, a written agreement is executed and a \$500 deposit is required. The balance is due upon delivery of the financial plan. The fee is negotiable. The firm will assist the client with the

summary of recommendations at no additional charge for a period up to one year from the time the Agreement is signed unless the Agreement is terminated earlier by either party. Each year, clients will be asked to renew their Comprehensive Financial Planning Agreement and a new fee for the following year will be determined.

Comprehensive Financial Planning and Investment Management Fee

The Comprehensive Financial Planning & Investment Management fee will be based on a percentage of the total assets under management according to the below annual fee schedule. Assets allocated to cash or a cash proxy, such as a money market account, is included in the calculation of an account's management fee. The firm will be compensated via a fee share from Morningstar Investment Services to which it directs its clients. The one fee deducted from client accounts quarterly is calculated and deducted by MIS and includes both the fee portion that remains with MIS for their service and the fee that is forwarded to Sea Clear Financial Planning by MIS for payment of Sea Clear Financial Planning's services to the client. Total pricing can vary when strategies are combined. Annual fees are billed quarterly in advance and are based on the prior quarter's ending balance. The client must consent in advance via a written agreement to direct debiting of the management fee from their investment account(s). The minimum quarterly fee is \$1,250. The fees charged are negotiable and will not exceed any limit imposed by any regulatory agency. The final fee amount will appear within the Morningstar Investment Proposal which the client must sign to begin services.

Stock Portfolios	Annual Fee	ETF Portfolios	Annual Fee	Mutual Fund Portfolios	Annual Fee
\$0.00 To \$500,000	1.35%	\$0.00 To \$500,000	1.25%	\$0.00 To \$500,000	1.15
\$501,000 to 1,000,000	1.30%	\$501,000 to 1,000,000	1.20%	\$501,000 to 1,000,000	1.05
\$1,001,000 to \$2,000,000	1.25%	\$1,001,000 to \$2,000,000	1.15%	\$1,001,000 to \$2,000,000	0.95
\$2,000,0001 and up	1.20%	\$2,000,0001 and up	1.10%	\$2,000,0001 and up	0.85

Retirement Plan Asset Advisement is set at 1% of the participant's plan assets. For clients who would like to engage this service, clients are required to open an investment account at the custodian Charles Schwab & Co. Inc. with a minimum deposit of \$25,000 and establish a Morningstar Investment Services portfolio recommended by the firm. Fees for this service are calculated by the firm and deducted quarterly in advance from the investment account separately from fees charged by Morningstar Investment Services for asset management services.

B. Payment of Fees

Comprehensive Financial Planning

The comprehensive financial planning deposit of \$500 is due upon inception of the agreement. The balance is due at the comprehensive financial plan meeting where the recommendations are presented to the client. For clients not having their assets managed, a new comprehensive financial planning fee will be assessed each year. The fee is negotiable.

Comprehensive Financial Planning and Investment Management Fee

The comprehensive financial planning and investment management fee is billed quarterly in advance and is based on the prior quarter's total portfolio ending balance. The client must consent in advance to direct debiting of this fee from their investment account. The one fee deducted from client accounts quarterly is calculated and deducted by Morningstar Investment Services ("MIS") and includes both the fee portion that remains with MIS for their service and the fee that is forwarded to Sea Clear Financial Planning by MIS for payment of Sea Clear Financial Planning's services to the client. Retirement Plan Asset Advisement Fees are calculated and submitted to Charles Schwab to be deducted from client accounts. Please see below for further details. The minimum quarterly fee is \$1,250. The fee is negotiable. The final fee amount will appear within the Morningstar Investment Proposal which the Client must sign to begin services. The Retirement Plan Advisement fee is set at 1% of the participant's plan assets. This service is only available to clients who sign a Comprehensive Financial Planning and Investment Management Agreement. Clients are required to open an investment account at the custodian Charles Schwab & Co. Inc. with a minimum deposit of \$25,000 and establish a Morningstar Investment Services portfolio recommended by the firm. Fees for this service are calculated by the firm and deducted quarterly in advance from the investment account separately from fees charged by Morningstar Investment Services for asset management services.

Limited Scope Financial Planning Client

For limited scope engagements, the full balance is due upon presentation of the work completed.

C. Client Responsibility For Third Party Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds, exchange-traded funds or stocks. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. No portions of these fees are paid to Sea Clear Financial Planning, LLC. Clients are responsible for the payment of all third-party fees (i.e., custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Sea Clear Financial Planning. Please see Item 12 of this brochure regarding broker-dealer/custodian.

Mutual funds generally have an expense ratio. The expense ratio is the annual fee that all funds charge their shareholders. It expresses the percentage of assets deducted each fiscal year for fund expenses, including 12b-1 fee, management fees, administrative fees, operating costs, and all other asset-based costs incurred by the fund. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. For a complete discussion of expenses related to each mutual fund, each client should read a copy of the prospectus issued by that fund. Sea Clear Financial Planning can provide or direct each client to a copy of the prospectus for any fund recommended to that client. No portions of these fees are paid to Sea Clear Financial Planning.

D. Prepayment of Fees

Comprehensive Financial Planning and Investment Management fees are billed quarterly in advance and are based on the prior quarter's ending balance. A client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period. A client may terminate any of the aforementioned agreements at any time by notifying Sea Clear Financial Planning, LLC in writing. Any unearned fees will be returned to the client. Because a great deal of work on a client's financial plan is performed in the beginning of the engagement, clients should be aware that a return of the unearned fees may not directly correlate to the pro rata return based on the number of days.

E. Outside Compensation For The Sale Of Securities

Neither Sea Clear Financial Planning nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees

The firm's Comprehensive Financial Planning and Investment Management fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of managed funds, also known as performance-based fees. Sea Clear Financial Planning does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Sea Clear Financial Planning provides its services primarily to individuals and families. Client relationships vary in terms of scope and length of service. The firm does not require a minimum dollar value of assets or other conditions for investment management. The firm, does, however, charge minimum fees as described in Item 5: Fees and Compensation, above. The firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, preexisting relationships or as otherwise determined by the firm principal. The firm also reserves the right to decline services to any prospective client for any reason.

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

A. Methods of Analysis

If the firm is engaged to provide investment consultation or supervisory services through a Comprehensive Financial Planning and Investment Agreement, the client's current financial situation, goals, objectives and tolerance for risk are initially evaluated. Asset allocation and investment policy decisions are made and discussed with the client to, in the adviser's best judgment, meet the client's objectives while minimizing risk exposure. Sea Clear Financial Planning uses the Third-Party investment manager, Morningstar Investment Services ("MIS") for all portfolio management. Morningstar Investment Services' methods of analysis include fundamental analysis, technical analysis, quantitative analysis and modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is an investment approach that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

B. Investment Strategies

The investment strategy for a specific client is based upon the objectives and goals illustrated in the financial plan. The client may change these objectives at any time. At Sea Clear Financial Planning the firm's investment strategy corresponds with the portfolio recommended by the firm and offered through Morningstar Investment Services. Portfolios are invested for the long term.

C. Risk of Loss

While Sea Clear Financial Planning, LLC believes its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot guarantee that an investment objective or planning goal will be achieved. Some investment decisions made by the firm and/or client may result in loss, which may include loss of the original principal invested. It is important for clients to know and remember that all investments carry risks. Investing in securities involves risk of loss that clients should be prepared to bear.

Investors Face The Following Risks When Making Any Investment:

Interest Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not liquid.

Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Transition risk: As assets are transitioned from a client's prior adviser to Sea Clear Financial Planning, LLC there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Sea Clear Financial Planning, LLC. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Sea Clear Financial Planning, LLC may adversely affect the client's account values, as Sea Clear Financial Planning, LLC's recommendations may not be able to be fully implemented.

Investors Face The Following Risks of Methods of Analysis:

Fundamental Analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical Analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made as to whether a stock price will increase over time. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Quantitative Analysis. Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investors Face The Following Risks of Investment Strategies:

Sea Clear Financial Planning's use of long-term trading holds risk and clients should be aware that there is a material risk of loss. Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation risk, interest rate risk, economic risk, market risk, and regulatory risk.

Investors Face The Following Risks of Third-Party Asset Management:

Sea Clear Financial Planning selected Morningstar Investment Services ("MIS") because the firm believes MIS demonstrates the highest level of integrity. Sea Clear Financial Planning's selection process cannot ensure that MIS will perform as desired and Sea Clear Financial Planning will have no control over the day-to-day operations of MIS. Sea Clear Financial Planning would not necessarily be aware of certain activities at MIS, including without limitation MIS' engaging in unreported risks, investment "style drift" or even regulator breach or fraud. In monitoring and analyzing MIS, Sea Clear Financial Planning uses benchmarking analysis, assessing whether the adviser's performance has met, exceeded, or fallen short of comparable benchmarks (e.g., Russell 2000, S&P 500, etc.).

Model portfolios are designed to capture return and risk at market rates. This seeks to provide clients with diversification benefits help to smooth returns, reduce volatility and decrease asset-class and singlestrategy risks. Risks specific to using model portfolios include the possibility that the model portfolio will underperform the market and the possibility that the model will not be able take advantage of opportunities that a non-model portfolio management approach might capture. Model portfolios entail inflation (purchasing power) risk, interest rate risk, economic risk, market risk, political/regulatory risk, and asset allocation risk – meaning that any given asset allocation strategy does not guarantee any specific result or profit nor protect against a loss.

Investors Face The Following Risks of Specific Securities Utilized:

While Sea Clear Financial Planning believes MIS strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, the firm cannot guarantee that an investment objective or planning goal will be achieved. Some investment decisions made by the firm and/or client may result in loss, which may include loss of the original principal invested. It is important for clients to know and remember that all investments carry risks. Investing in securities involves risk of loss that clients should be prepared to bear and are not guaranteed or insured by the FDIC or any other government agency.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

Fixed Income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This includes corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile, and fixed income securities carry significant interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting, but these bonds still carry a risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risks inherent in non-U.S. investing.

Non-U.S. Securities present certain additional risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond (fixed income) nature or stock (equity) nature, or a mix of multiple underlying security types.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss. Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Because ETFs use "authorized participants" (APs) as agents to facilitate creations or redemptions (primary market), there is a risk that an AP decides to no longer participate for a particular ETF; however, that risk is mitigated by the fact that other APs can step in to fill the vacancy of the withdrawing AP [an ETF typically has multiple APs] and ETF transactions predominantly take place in the secondary market without need for an AP. Like other liquid securities, ETF pricing changes throughout the trading day and there can be no guarantee that an ETF is purchased at the optimal time in terms of market movements. Moreover, due to market fluctuations, ETF brokerage costs, differing demand and characteristics of underlying securities, and other factors, the price of an ETF can be lower that the aggregate market price of its cash and component individual securities (net asset value – NAV). An ETF is subject to the same market risks as those of its underlying individual securities, and also has internal expenses that can lower investment returns.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-Regulatory Organizations (SRO) Proceedings

There are no self-regulatory proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. <u>Registration as a Broker/Dealer or Broker/Dealer Representative</u>

Neither Sea Clear Financial Planning, LLC nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. <u>Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading</u> <u>Advisor</u>

Neither Sea Clear Financial Planning, LLC nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither Sea Clear Financial Planning, LLC nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Please refer to Item 8 where the firm discusses the use of Morningstar Investment Services. Sea Clear Financial Planning will direct clients to a third-party investment manager. Clients will pay Sea Clear Financial Planning its standard fee in addition to the standard fee for the third-party investment manager to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. Sea Clear Financial Planning, LLC will always act in the best interests of the client, including when determining which third party investment manager to recommend to its clients. Sea Clear Financial Planning will ensure that all recommended managers are exempt, licensed or notice filed in the states in which Sea Clear Financial Planning is recommending them to clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. <u>Code of Ethics</u>

Sea Clear Financial Planning has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Political and Charitable Contributions, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance with firm Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

In addition to the firm's Code of Ethics, Kelly Trageser, MBA, CFP[®] also adheres to the Certified Financial Planner Board of Standards Code of Ethics:

Principle 1 – Integrity - An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors are placed by clients in positions of trust by clients, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – **Objectivity** - An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence - Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness - Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – **Confidentiality** - Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – **Professionalism** - Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence - Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

B. <u>Retirement Account Rollovers/Transfers (eg.,401(k) and IRAs)</u>

When Sea Clear Financial Planning recommends that a client rollover a retirement account from a current retirement plan to an IRA to be managed by Sea Clear Financial Planning, the firm and its managing member have a conflict of interest. The potential conflict of interest is related to the management fees that can be earned based on these assets through the recommendation of rolling over the account into a new IRA managed by Sea Clear Financial Planning. Sea Clear Financial Planning and its managing member will not earn any investment advisory fee if the client does not rollover the assets from the existing employer retirement plan or IRA. Thus, Sea Clear Financial Planning and its managing member have an economic incentive to recommend a rollover of the retirement account, which creates a conflict of interest. Sea Clear Financial Planning has taken steps to manage this conflict of interest arising from rolling over such retirement assets to an IRA and has adopted written policies and procedures whereby Sea Clear Financial Planning and its managing member will disclose the advantages and disadvantages of the retirement plan or IRA rollover options available to the client and will only recommend the assets be rolled over if it is in the best interest of the client.

C. <u>Participation or Interest in Client Transactions</u>

Neither Sea Clear Financial Planning, LLC nor any related person are authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc. Additionally, employees are prohibited from taking or providing a loan from a client unless it is an approved financial institution or the natural person is an immediate family member.

D. Personal Trading of Similar Securities

Sea Clear Financial Planning does not recommend specific securities to clients and therefore representatives of Sea Clear Financial Planning do not buy or sell securities for themselves that they also recommend to clients. However, Kelly Trageser, MBA, CFP[®], the firm's managing member, does participate in the same portfolio models as clients. Her trades are not entered in advance of client trades and are generally traded together by MIS.

E. <u>Personal Trading and Timing of Securities</u>

Sea Clear Financial Planning does not trade securities and relies on Morningstar Investment Services to place the trades within their models and therefore has no control of when personal trades are entered.

Item 12: Brokerage Practices

A. Factors Used To Select Custodians and / or Broker Dealers

Sea Clear Financial Planning recommends that investment accounts be held in custody by Charles Schwab & Co. Inc., an unaffiliated SEC-registered broker-dealer and FINRA member. Charles Schwab & Co. Inc. offers enhanced services to independent investment advisors. These services include custody of securities, trade execution platforms, and access to research not available to the general public. Charles Schwab & Co. Inc. is wholly independent from Sea Clear Financial Planning, LLC. It is expected that most, if not all, transactions in a given client account will be cleared through the custodian of that account in its capacity as a broker-dealer.

Sea Clear Financial Planning recommends Charles Schwab & Co. Inc. to its clients based on a variety of factors. These include, but are not limited to, commission costs. Charles Schwab & Co. Inc. has what can be considered discounted commission rates. However, in choosing a broker-dealer or custodian to recommend, the firm is most concerned with the value the client receives for the cost paid, not just the cost. Charles Schwab & Co. Inc. adds value beyond commission cost. Other factors that may be considered in determining overall value include speed and accuracy of execution, financial strength, knowledge and experience of staff, research and service. Charles Schwab & Co. Inc. also has arrangements with many mutual funds that enable us to purchase these mutual funds for client accounts at reduced transaction charges (as opposed to other broker-dealers). Sea Clear Financial Planning, LLC re-evaluates the use of Charles Schwab & Co. Inc.at least annually to determine if they are still the best value for clients. Sea Clear Financial Planning LLC does not consider whether Charles Schwab & Co. Inc. or any other broker-dealer/custodian, refers clients to Sea Clear Financial Planning, LLC as part of the firm's evaluation of such custodians or broker-dealers.

Best Execution

Custodians/broker-dealers will be recommended based on Sea Clear Financial Planning LLC's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and Sea Clear Financial Planning, LLC may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of the firm. Sea Clear Financial Planning, LLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Soft Dollars

Charles Schwab & Co. Inc. provides the firm with some non-cash benefits (not available to retail customers) in return for placing client assets with them or executing trades through them. Such non-cash benefits are referred to as "soft dollars" consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. Currently, these benefits come in the form of investment research and sponsored attendance at various investment seminars. The firm may also receive such items as investment software, books and research reports. These products, services, or educational seminars are items that don't play a role in determining how to invest client accounts. "Soft dollars" may cause a conflict of interest as the firm may want to place more client accounts with a broker-dealer/custodian such as Charles Schwab & Co. Inc., solely because of these added benefits. As such, a firm may have an incentive to select or recommend a broker-dealer based on receiving the research or other products or services, rather than on a clients' best interest in receiving the most favorable execution. Sea Clear Financial Planning, LLC attempts to mitigate this potential conflict by instructing Morningstar Investment Services to perform all trading in client accounts and perform the associated execution reviews.

Directed Brokerage

Sea Clear Financial Planning will require clients to use Charles Schwab & Co., Inc.

B. Aggregating Trades

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Since Morningstar Investment Services, Inc. manages the portfolios and places the trades, Sea Clear Financial Planning, LLC is not involved with aggregating trades.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Portfolio management accounts are reviewed semiannually by the firm's managing member and Chief Compliance Officer, Kelly Trageser, MBA, CFP[®] with regard to clients' respective investment policies and risk tolerance levels. Account reviews are performed more frequently when market conditions dictate. Accounts are rebalanced as necessary. Assets not being managed by Sea Clear Financial Planning, LLC are the client's responsibility to monitor and review. All financial plans are reviewed upon financial plan creation, plan delivery and semiannually by the firm's managing and Chief Compliance Officer, Kelly Trageser, MBA, CFP[®].

B. Triggers for Non-Periodic Reviews

Portfolio management reviews may be triggered by material market, economic, or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. <u>Regular Reports</u>

Clients receive monthly account statements from Charles Schwab & Co. Inc. and quarterly performance reports from Morningstar Investment Services, Inc. Clients should always carefully review all statements from Charles Schwab & Co. Inc., and any materials prepared by Morningstar Investment Services as the client's review of these materials is an important part of client's obligations to the provide Sea Clear Financial Planning, LLC appropriate feedback regarding questions and concerns. Clients will receive statements and trade confirmations directly from Charles Schwab & Co. Inc. The firm encourages clients to carefully review the statements and confirmations sent to them by Charles Schwab & Co. Inc., and to compare the information on any reports prepared by Morningstar Investment Services against the information in the statements provided directly from the custodian. Clients should notify Sea Clear Financial Planning, LLC of any discrepancies. Sea Clear Financial Planning does not create or distribute client account reports.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients

Please see the response to Item 12 of this Part 2A with reference to certain benefits provided by Charles Schwab & Co. Inc.

B. Compensation for Client Referrals to persons not supervised

Sea Clear Financial Planning, LLC does not compensate non-advisory personnel for client referrals.

Item 15: Custody

For clients who hold Morningstar Investment Services ("MIS") managed portfolios, invoices will be delivered from MIS in the form of quarterly reports. These reports are not generated by Sea Clear Financial Planning, as MIS calculates the fees withdrawn from those client accounts. Clients should carefully review reports, statements and invoices for accuracy and contact Sea Clear Financial Planning if any discrepancies are noticed.

In limited cases, where client portfolios fall below the minimum asset requirement or when the managing member is advising on an outside employer sponsored retirement plan, the firm will calculate the fee and direct Charles Schwab & Co., Inc. to deduct fees directly from client accounts. In these situations, the firm will be deemed to have limited custody of the client's assets and must have written authorization from the client. Clients will receive all account statements from the custodian and an invoice from Sea Clear Financial Planning as required in each jurisdiction.

Item 16: Investment Discretion

Sea Clear Financial Planning provides discretionary and non-discretionary investment advisory services to its clients. The Comprehensive Financial Planning and Investment Management Agreement established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, Sea Clear Financial Planning generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought or sold, or the price per share.

Sea Clear Financial Planning will also have discretionary authority to determine the broker dealer to be used for a purchase or sale of securities for a client's account.

Item 17: Voting Client Securities

Sea Clear Financial Planning will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

There are no material financial circumstances or conditions that would reasonably be expected to impair the firm's ability to meet its contractual obligations to its clients. The firm does not serve as a custodian for client accounts and does not require or solicit prepayment of more than \$500 per client, six months or more in advance. Therefore, a balance sheet is not required with this brochure. Sea Clear Financial Planning has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements for State Registered Advisors

A. Principal Officers

Sea Clear Financial Planning currently has only one management person/executive officer: Kelly Trageser, MBA, CFP[®]. Her education and business background can be found on the Form ADV Part 2B brochure supplement.

B. Other Businesses

Sea Clear Financial Planning, LLC and its managing member is not involved in any other businesses.

C. Performance Based Fees

Sea Clear Financial Planning, LLC will not collect performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Disclosure Events

No management person of Sea Clear Financial Planning, LLC has been involved in any disclosure events.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.



Sea Clear Financial Planning, LLC Form ADV Part 2B – Individual Disclosure Brochure

for

Kelly Trageser, MBA, CFP[®] Personal CRD Number: 3078771 Investment Adviser Representative

This brochure supplement provides information about Kelly Trageser, MBA, CFP® that supplements the Sea Clear Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Kelly Trageser, MBA, CFP® Principal and Chief Compliance Officer if you did not receive Sea Clear Financial Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kelly Trageser, MBA, CFP[®] is also available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

Item 2: Educational Background and Business Experience

Managing Member / Firm Principal / CFP[™] / Investment Adviser Representative Kelly Trageser, MBA, CFP[®] Born: 1970

Education

Certificate in Financial Planning, Fairleigh Dickinson University, Madison, NJ, March 2010 MBA in Finance, Pace University, New York, NY, May 1998 BA in Economics, Bucknell University, Lewisburg, PA, Dec. 1993

Business Experience

Principal, Sea Clear Financial Planning, LLC, Brielle, NJ (2011-Present) Associate Financial Planner, Aznar Financial Advisors, Morris Plains, NJ (2009-2011) Senior Credit Analyst, GE Capital Solutions, Inc. Matawan, NJ (2001-2008) Credit Analyst, Nomura Securities International, New York, NY (1998-2001) Traders Assistant, Mitsui and Co., USA, Inc. New York, NY (1993-1998)

Professional Designations

Kelly Trageser, MBA is a CERTIFIED FINANCIAL PLANNER™ professional.

The CFP® certification is a recognized standard for personal financial planning. Only those who have fulfilled the certification and renewal requirements of the CFP Board can display the CFP® certification marks. The CFP® certification meet stringent Education, Examination, Experience, and Ethics requirements in order to have the right to use the CFP® certification marks. Kelly L. Trageser is a CFP® professional.

The CERTIFIED FINANCIAL PLANNER[™], CFP[®] and federally registered CFP (with flame design) marks (collectively, the "CFP[®] marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP[®] certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education - CFP[®] professionals must develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study at a college or university offering a financial planning curriculum approved by CFP Board. Other options for satisfying the education component include submitting a transcript review or previous financial planning-related course work to CFP Board for review and credit, or showing the attainment of certain professional designations or academic degrees.

Examination: CFP[®] practitioners must pass a comprehensive CFP[®] Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. Based on regular research of what planners do, the exam covers the financial planning process, tax planning, employee benefits and retirement planning, estate planning, investment management and insurance.

Experience - CFP[®] professionals must have three years minimum experience in the financial planning process prior to earning the right to use the CFP[®] certification marks. As a result, CFP[®] practitioners possess financial counseling skills in addition to financial planning knowledge.

Ethics – As a final step to certification, CFP[®] practitioners agree to abide by a strict code of professional conduct, known as CFP Board's Code of Ethics and Professional Responsibility that sets forth their ethical responsibilities to the public, clients and employers. CFP Board also performs a background check during this process, and each individual must disclose any investigations or legal proceedings related to their professional or business conduct.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP[®] marks. CFP[®] professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP[®] certification

Continuing Education – 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.

Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP[®] professionals provide financial planning services at a fiduciary standard of care. This means CFP[®] professionals must provide financial planning services in the best interests of their clients.

Item 3: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised person providing investment advice. No information is applicable to this Item for Kelly Trageser, MBA, CFP[®]

Item 4: Other Business Activities

Kelly Trageser, MBA, CFP[®] is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5: Additional Compensation

Other than salary, Kelly Trageser, MBA, CFP[®] does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Sea Clear Financial Planning, LLC.

Item 6: Supervision

As the Chief Compliance Officer of Sea Clear Financial Planning, LLC, Kelly Trageser, MBA, CFP[®] supervises all duties and activities of the firm. Kelly Trageser, MBA, CFP[®]'s contact information is on the cover page of this disclosure document. Kelly Trageser, MBA, CFP[®] adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

Item 7: State Requirements

A. Kelly Trageser, MBA, CFP[®] has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.
- B. Kelly Trageser, MBA, CFP[®] has not been the subject of a bankruptcy petition at any time.