

Firm Brochure

(Form ADV, Part 2A)

This brochure provides information about the qualifications and business practices of Seneschal Advisors, LLC (CRD #131618). If you have any questions about the contents of this brochure, please contact us at (253) 460-3430 or email us at info@seneschaladvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Seneschal Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Seneschal Advisors, LLC is a registered investment adviser. Registration, however, should not be relied upon as an indication of skill or training.



*Seneschal Advisors, LLC
7350 Cirque Drive West
Suite 101
University Place, WA 98467
Phone: (253) 460-3430
Fax: (253) 565-0464
Email: info@seneschaladvisors.com
www.seneschaladvisors.com*

March 31, 2012

2 Material Changes

The last annual filing of this Firm Brochure was March 31, 2011. This section summarizes material changes incorporated subsequent to that date.

In April 2012 the Firm filed for registration with the State of Washington as required under the Dodd-Frank Wall Street Reform and Consumer Protection Act. It is anticipated that the Firm's registration will be effective and withdrawal of SEC registration will be completed by June 28, 2012.

Section 4, Advisory Business, Assets Under Management, page 7:

Assets under management and number of accounts have been changed to reflect results of operations as of December 31, 2011.

Section 13, Review of Accounts, Portfolio Review Process, page 19 -20:

Language has been changed to more clearly and accurately reflect our current processes.

Specifically, in light of market volatility, we changed our process to provide for timelier rebalancing of portfolios prior to meeting with clients to review and discuss our conclusions and recommendations.

Section 16, Investment Discretion, page 22:

Language has been added to clarify current policy and practices for managing accounts on a non-discretionary basis.

Brochure Supplement, Form ADV, Part 2B:

We have added required supplemental information to add Jeffrey M. Lang, Director of Wealth Management, as a supervised person.



3 Table of Contents

Contents

(Form ADV, Part 2A)	1
2 Material Changes	2
3 Table of Contents	3
4 Advisory Business	5
Services We Provide	5
Financial Planning Services	5
Investment Management Services	6
Types of Engagements	6
Comprehensive Wealth Management Engagement	6
Investment Management Engagement	6
Limited Scope Financial Planning Engagement	7
Assets Under Management	7
5 Fees and Compensation	8
Comprehensive Wealth Management Fees	8
Investment Management Fees	8
Limited Scope Planning Fees	9
Mutual Fund Fees	10
Custodial Fees	10
6 Performance-Based Fees	11
7 Types of Clients	11
8 Methods of Analysis, Investment Strategies and Risk of Loss	12
Methods of Analysis	12
Investment Strategies	12
Important Notice	13
9 Disciplinary Information	14
10 Other Financial Industry Activities and Affiliations	14
11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	15
Code of Ethics	15

Standards of Conduct.....	15
Policies.....	15
Participation or Interest in Client Transactions	15
Personal Trading	15
12 Brokerage Practices.....	16
The Custodian and Broker We Use	16
How we Select Brokers/Custodians	16
Your Brokerage and Custody Costs.....	16
Products and Services Available to Us from Schwab	17
Services that Directly Benefit You	17
Services that May Not Directly Benefit You	17
Services that Generally Benefit Only Us.....	17
Our Interest in Schwab's Services	18
13 Review of Accounts.....	19
Portfolio Review Process	19
Planning Review Process.....	20
Quarterly Portfolio Reports.....	20
14 Client Referrals and Other Compensation	21
15 Custody	21
16 Investment Discretion	22
17 Voting Client Securities.....	22
18 Financial Information.....	23
19 Requirements for State-Registered Advisers	24
(Form ADV, Part 2B)	25
Jon M. Duncan, Managing Member.....	26
(Form ADV, Part 2B)	27
Jeffrey M. Lang, Director of Wealth Management	28

4 Advisory Business

Services We Provide

Seneschal Advisors, LLC is in the business of providing personal financial planning and investment management services. In May 2004 we started business as Jon M. Duncan, CFP®, LLC. Later, in September 2006, we changed our name to Seneschal Advisors, LLC. The sole owner of Seneschal Advisors, LLC is Jon M. Duncan.

Seneschal Advisors, LLC is a fee-only financial planning and investment management firm. Our sole source of compensation is received in the form of advisory fees paid by our clients. We do not receive any commissions or other fees related to the sale of annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned financial products. Moreover, the firm is not affiliated with any persons or other businesses that sell financial products or securities.

Financial Planning Services

We work with you to develop a long-range plan to achieve your financial goals, like retirement or financing a child's college education. Since each client is different the services that we provide vary from client to client. For example, you may be more concerned about planning for retirement and less concerned about education planning. In the same way, our advice will vary from client to client.

Depending upon your needs and circumstances our planning advice may cover one or more of the following financial planning subject areas:

- Cash Management and Budgeting
- Risk Management and Insurance
- Education Planning
- Retirement and Financial Independence Planning

- Estate Planning
- Investment Planning and Asset Allocation
- Integrating Tax and Financial Planning

In general, our financial planning services include:

- Meeting with you to clarify your long-range financial goals and establish a mutually agreeable work plan and fee
- Providing you with a list of documents and other information we will need to do our work
- Preparing a preliminary Wealth Management Assessment of your current financial situation, including the preparation of financial statements and an initial assessment of the feasibility of achieving your goals
- Meeting with you to review our preliminary analysis, reassess your goals as necessary, and identify planning subject areas most in need of your attention
- Performing a detailed analysis of alternative planning strategies for each subject area identified as needing your attention and recommend a course of action
- Discussing our recommendations with you
- Preparing a written financial planning report summarizing our analysis and recommendations
- Assisting you in implementing our recommendations
- Periodically monitoring your progress against your plan and updating your plan as needed

While we take a comprehensive approach to our planning services, there are some services that we are not able to provide. For example, we are not licensed or qualified to practice accounting, prepare tax returns, or provide legal advice. You will need to involve other qualified and licensed professionals to provide these services and, as a result, you may incur additional costs.

If you need us to refer you to a qualified professional, we would be pleased to do so. SENESCHAL ADVISORS, LLC, however, is not affiliated with any other firm or agent and does not receive compensation of any kind when making referrals to other professionals. Moreover, while we are pleased to refer clients to professionals that we believe to be competent, we cannot guarantee that they are. Accordingly, you are encouraged to do your own due diligence and not rely solely on our referral.

Investment Management Services

Investment advice is an integral part of the services that we provide. Our investment management services include:

- Developing a written Investment Policy Statement. Your Investment Policy Statement clearly states your investment objective, time frame for investing, risk tolerance, asset allocation strategy, specific constraints and preferences, and procedures for managing and periodically rebalancing your portfolio.
- Advising you on how to structure your portfolio. For example, based on your financial plan and risk tolerance we will recommend which asset classes to include in your portfolio and how much to invest in each.
- Evaluating and selecting mutual funds to implement your asset allocation strategy.
- Establishing custodial accounts for you with a qualified custodian and directing trading on a discretionary basis.
- Monitoring your custodial account activity, cash level, and securities positions on a regular basis.
- Evaluating and reporting portfolio performance on a quarterly schedule.
- Buying and selling securities in your portfolio (sometimes referred to as “rebalancing”) as necessary to maintain compliance with your Investment Policy Statement.

We tailor our investment management services to meet the needs and circumstances of each

client. For example, you may wish to restrict investment in certain types of securities or asset classes. In drafting your Investment Policy Statement we specifically include any specific constraints, restrictions or preferences that you want us to observe in managing your investment portfolio.

We review each client portfolio on a quarterly schedule or more often as needed. The objective of our review is to ensure that your portfolio is being managed in accordance with your Investment Policy Statement.

Types of Engagements

You have the option to work with us in one of three ways:

Comprehensive Wealth Management Engagement

In a comprehensive wealth management engagement we assist you in developing a comprehensive financial plan and managing your investments on an ongoing basis. As noted above (see “Financial Planning Services”) we help you to clarify your long-term financial planning goals in several financial planning subject areas, evaluate alternative strategies for achieving them, and then make recommendations. In addition, we help you implement your plan by developing an investment policy statement, setting up brokerage accounts, and managing your investments on an on-going discretionary basis in accordance with your investment policy (see “Investment Management Services” above). Our fees for comprehensive engagements are negotiated with each client and are based on the value of your portfolio (see “Comprehensive Wealth Management Fees” below).

Investment Management Engagement

An Investment Management Engagement is focused specifically on providing on-going investment management services (see “Investment Management Services” above).

Typically, financial planning services are limited to those necessary to define your investment objectives and draft your Investment Policy Statement. Our fees for investment management engagements are negotiated with each client and are based on the value of your portfolio (see “Investment Management Fees” below).

Limited Scope Financial Planning Engagement

A limited scope financial planning engagement is generally focused on only one or a few financial planning subject areas and does not include ongoing investment management services. We will meet with you prior to engagement to clarify the scope of our work and our fee and then provide you with a written engagement letter that serves as our mutual agreement. Each limited scope engagement is tailored to address the specific needs and circumstances of the client. Limited scope financial planning are based on the scope and complexity of work to be performed and are paid in arrears in progress payments as we complete our work (see “Limited Scope Planning Fees” below).

The scope of work, the fees to be charged, timing and our respective responsibilities are clarified in writing for all engagements prior to engagement. In the cases of Comprehensive Wealth Management and Investment Management Engagements, we will provide you

with a standard form of Advisory Services Agreement. Advisory Services Agreements are on-going agreements; they do not have an expiration date. You or we may terminate our agreement at any time without penalty. Any unearned advisory fees will be refunded to you as soon as practically possible. In Limited Scope Financial Planning Engagements we will provide you with an engagement letter. You or we may terminate our engagement letter at any time without penalty. Any unbilled fees will be billed and you will be given a 30 day grace period to pay them. Advisory Service Agreements and engagement letters are specifically executed by and between you and SENESCHAL ADVISORS, LLC. They may not be assigned to another party without your prior approval.

Assets Under Management

The following table summarizes the total assets managed and supervised by SENESCHAL ADVISORS, LLC as of December 31, 2011:

Assets Under Management (Discretionary)	\$73,516,181
Assets Under Management (Non-Discretionary)	0
Total Assets Under Management	\$73,516,181



#

5 Fees and Compensation

Fees are individually negotiated with each client and depend upon the nature of the services we are engaged to provide (see “Types of Engagements” above). Generally, fees for comprehensive and investment management engagements are higher than for limited-scope engagements. There are three methods by which we charge fees: (1) Comprehensive Wealth Management Fees; (2) Investment Management Fees; and (3) Limited Scope Planning Fees.

Comprehensive Wealth Management Fees

Comprehensive Wealth Management Fees depend on the value of assets managed. Our standard Comprehensive Wealth Management Fee is the lesser of 1% of assets managed per year or the amount calculated using the following schedule:

Fixed Fee \$4,000/year

Plus Variable Fee:

<u>Assets Managed</u>	<u>Annual Fee</u>
First \$1,000,000	.55%
Next \$4,000,000	.45%
Over \$5,000,000	.35%

Comprehensive Wealth Management Fees are billed in advance on a quarterly basis. You have the option of paying advisory fees by check or by having fees deducted from your account. A detailed invoice will be sent to you within two weeks of the beginning of each calendar quarter showing the formula used to calculate your fee, the assets under management on which your fee is based, and the time period covered. Comprehensive Wealth Management Fees are

billed in quarterly increments at the beginning of each calendar quarter based on the value of assets managed as of the end of the previous quarter. Advisory fee bills are mailed to clients within the first ten business days of the beginning of each calendar quarter and are due 14 days from the billing date.

You may terminate your Advisory Services Agreement with us at any time by written notice. In the event of termination, prepaid Asset Based Fees are pro rated to the date of termination and any unearned fees are refunded to you as soon as practically possible.

For fee calculation purposes, we may combine one or more accounts of one or more members of the same household.

Investment Management Fees

Investment Management Fees depend on the value of assets managed. Our standard Investment Management Fee is the lesser of 1% of assets managed per year or the amount calculated using the following schedule:

<u>Assets Managed</u>	<u>Annual Fee</u>
First \$1,000,000	.55%
Next \$4,000,000	.45%
Over \$5,000,000	.35%

Investment Management Fees are billed in advance on a quarterly basis. You have the option of paying advisory fees by check or by having fees deducted from your account. A detailed invoice will be sent to you within two weeks of the beginning of each calendar quarter showing the formula used to calculate your fee, the assets under management on which your fee

is based, and the time period covered. Investment Management Fees are billed in quarterly increments at the beginning of each calendar quarter based on the value of assets managed as of the end of the previous quarter. Advisory fee bills are mailed to clients within the first ten business days of the beginning of each calendar quarter and are due 14 days from the billing date.

You may terminate your Advisory Services Agreement with us at any time by written notice. In the event of termination, prepaid Asset Based

planning engagement is different, Table 5.1 is reflective of our current Limited Scope Financial Planning Fees.

Generally, fees will be lower for engagements focused on fewer planning areas and involving less complexity. Since each client situation is different, it is not possible to determine in advance the fee we will charge for any given planning engagement. We will, however, provide you with an engagement letter prior to contracting for services that clearly delineates the services to be performed, areas of financial

Table 5.1 Schedule of Limited Scope Planning Fees			
Engagement Scope	Professional (\$250/Hr.)	Staff (\$75/Hr.)	Estimated Fee
Wealth Management Assessment	\$2,500		
Detailed Planning (Per Planning Area) ¹	8 – 16 Hrs.	7 – 11 Hrs.	\$2,525 - \$4,825
Implementation	3 – 13 Hrs.	2 – 11 Hrs.	\$900 - \$4,075
On-Going Monitoring	3 – 15 Hrs.	2 – 11 Hrs.	\$900 - \$4,575

Fees are pro rated to the date of termination and any unearned fees are refunded to you as soon as practically possible.

For fee calculation purposes, we may combine one or more accounts of one or more members of the same household.

Limited Scope Planning Fees

Limited Scope Planning Fees are negotiated with each client based on the agreed-upon scope of work to be performed. After meeting with you, we will provide you with an engagement letter outlining the scope of work to be performed, the process to be followed, and the fee to be charged. Fees are determined by estimating the number of hours involved and are based on our currently prevailing hourly billing rates for professional services and staff support. The number of hours depends on the scope (i.e., the number of planning areas covered) and complexity of work to be performed. While each

planning to be covered, and fees to be charged. Additionally, your estimated fees based on estimated hours will be written into your Advisory Services Agreement. Limited Scope Planning Fees are billed in arrears as our work is completed and paid by check. Bills are due upon receipt and amounts more than 30 days past due may be assessed interest at the rate of 1% per month.

You may terminate your engagement letter with us at any time by written notice. In the event of termination, you will be billed for services rendered to the date of termination. Since fees are billed and paid after services are rendered, refunds generally are not made.

¹ Planning areas include: Cash Management & Budgeting, Risk Management & Insurance, Education Planning, Retirement & Financial Independence Planning, Estate Planning, Investment Planning, Tax Planning and Special Needs Planning.

Mutual Fund Fees

In addition to our advisory fees, you will incur management fees and other operating expense charges imposed by mutual funds in which you invest. Mutual fund fees and expenses vary from fund to fund depending upon the type and nature of the fund. In selecting mutual funds we explicitly consider fund fees and expenses and seek to minimize them. We do not benefit, directly or indirectly, from any mutual fund fees paid by you.

Custodial Fees

We recommend that all clients hold their investments in brokerage accounts established at Charles Schwab & Co., Inc. (“Schwab”). Schwab is unaffiliated with SENESCHAL ADVISORS, LLC and provides a broad range of trading and custodial services, some of which have associated fees. We do not share in any of the fees or commissions charged by Schwab. For a more complete discussion of custodial fees and expenses, please see “Your Brokerage and Custody Costs” below under “Brokerage Practices.”



6 Performance-Based Fees

Some investment advisors charge performance-based fees. Performance-based fees are fees based on a share of capital gains or capital appreciation of the assets held in your account, potentially creating an incentive to recommend

investments that carry a higher degree of risk. We believe that performance-based fees conflict with our fiduciary duty to you and do not charge them.



7 Types of Clients

SENESCHAL ADVISORS, LLC provides personal financial planning and investment advice to individuals. We also provide investment advice to individual participants in self-directed retirement plans, such as 401(k) plans.

We do not have a minimum account size requirement. However, given our standard fee schedule (see “Asset Based Fees” above), we generally find it impractical to manage portfolios valued at less than \$500,000 and generally do not accept them unless the account is part of a larger family/household relationship. If an existing account drops below \$500,000 we do not typically terminate our relationship. We may, however, change to a negotiated Fixed Fee.

We may agree to waive our minimum fee requirement and accept portfolios under \$500,000 in value when we anticipate that additional funds will be added to the account. Also, we waive our minimum fee requirement and accept portfolios less than \$500,000 for employees of SENESCHAL ADVISORS, LLC and their family members.



8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

In the process of managing your investments we employ several methods of analysis, including technical analysis (e.g., charting), fundamental analysis, and macroeconomic analysis. In doing so we rely on several sources of information, such as general distribution and financial newspapers and magazines, research reports prepared by unaffiliated third parties, credit ratings prepared by credit rating firms, and public filings with the SEC.

Investment Strategies

First and foremost, we believe that investments must be managed within the context of a broad financial planning frame work. Investing without a financial plan is nothing more than trading. Accordingly, we clarify your financial goals and work with you to develop a financial plan before we provide you with investment advice.

In general, our approach to investment management is focused on asset allocation. We believe that you can do more to enhance the long-term performance of your investment portfolio by establishing and maintaining a suitable asset allocation policy than actively trying to “beat” the market. We believe that capital markets are very efficient at pricing securities and that the risks of active trading outweigh the potential benefits. Accordingly, we do not actively pick or trade stocks nor do we attempt to time the market or rely on our own proprietary trading models. Our objective is to help you structure a globally diversified portfolio aimed at maximizing your return, given the level of risk you are willing to take.

For most clients, we believe mutual funds are suitable, cost effective investment vehicles.

Investing in mutual funds increases the diversification of your portfolio. Diversification, in turn, helps to reduce, but not eliminate, the risk of loss by limiting your exposure to any one security or asset class. On the other hand, and in the same way, diversification might also reduce the potential return of your portfolio. Our objective in managing client portfolios is to strike a balance between the benefits – i.e., lower risk – and the costs – i.e., lower returns – of diversification.

While mutual funds may help to diversify your portfolio and reduce the risk of loss associated with any one stock or bond, investing in mutual funds does not eliminate the risk of loss. Your portfolio may be exposed to any of the following sources of risk:

- Interest rate risk: when interest rates rise, the value of some investments, notably fixed income investments (i.e., bonds) declines.
- Market risk: All securities are subject to fluctuations in market prices stemming from external factors such as broad macroeconomic changes as well as political events.
- Inflation risk: Increasing prices reduce the purchasing value of some investments, especially those with fixed returns like bonds.
- Currency risk: Investments in foreign stocks and bonds (and mutual funds that buy them) increases the risk of loss stemming from changes in currency exchange rates.
- Reinvestment risk: Primarily related to fixed income investments, this is the risk that the future proceeds from the maturity or redemption of an investment will be reinvested at a lower rate of return.

- Business risk: Certain businesses and industries are riskier than others and investments in them carry a higher probability of loss.
- Liquidity risk: Without the ability to easily, quickly and cost-effectively sell an investment you may not be able to recover your investment.
- Financial risk: Also known as leverage, borrowing money increases the potential for return on investment but also increases the risk of default and bankruptcy.

Specific risks and expenses of mutual funds vary depending upon the investment mandate of the fund. For each mutual fund purchased in your account, you will receive a prospectus that discloses detailed information about the risks and expenses of the fund. You are urged to read the prospectus for each fund when you receive it.

Important Notice

Investing in securities involves the risk of loss. While we believe that our approach to investment management helps to reduce risk, we cannot guaranty that you will not lose money. Accordingly, before engaging us to help you manage your investments, you should be fully prepared to assume a risk of loss.



9 Disciplinary Information

Neither SENESCHAL ADVISORS, LLC nor any of its owners or employees have been named in any

criminal or civil actions, administrative proceedings or self-regulatory proceedings.



10 Other Financial Industry Activities and Affiliations

SENESCHAL ADVISORS, LLC is an independent financial advisory firm. We and all of our

employees, management and owners are unaffiliated with any other firm.

No employees, management or owners of Seneschal Advisors, LLC are registered, or have an application to register, as a securities broker-dealer or as a representative of a securities broker-dealer. Also, none of our employees, management or owners is registered, or has an application to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of any of the foregoing.



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

Code of Ethics

In accordance with SEC regulations, we have adopted a Code of Ethics that provides an operational and policy framework for ethical business practices. Our Code of Ethics establishes standards of conduct expected of all employees, on and off of the job, and policies designed to deal with conflicts of interest.

Standards of Conduct

All employees are expected to conduct themselves in accordance with the following standards:

- Integrity
- Objectivity
- Competence
- Fairness
- Confidentiality
- Professionalism
- Diligence

Policies

As part of our Code, we have adopted the following policies to address potential conflicts of interest:

- Protection of Non-Public Information
- Acceptance of Gifts
- Outside Business Activities
- Personal Trading
- Initial Public Offerings and Private Placements

More detailed information about our standards of conduct and policies is available by reading our Code of Ethics. We are pleased to provide copies of our Code upon request. If you would like a copy, please contact us using the phone number or email address on the cover sheet to this brochure.

Participation or Interest in Client Transactions

We do not recommend, buy or sell investments in which we have a financial interest such as general or limited partnerships, limited liability companies, or shares in privately owned, non-publicly traded companies.

Personal Trading

Our Personal Trading Policy restricts and regulates the trading activity of all employees and owners of the Firm and their family members. All employees and owners are required to report personal non-exempt securities transactions to the Firm's Chief Compliance Officer, Jon M. Duncan. Certain securities are exempt from reporting, including money market funds, open-end mutual funds, US government securities, and money market instruments. In addition, all employees and owners are required to provide the Chief Compliance Officer with a list of personal holdings on an annual basis. Finally, all employees and owners are required to obtain written approval from the CCO before investing in an initial public offering ("IPO") or a private placement.

Employees and owners of SENESCHAL ADVISORS, LLC, and their family members, may purchase the same publicly traded, open-end mutual funds that we recommend to our clients. Open-end mutual funds, however, are purchased and sold at net asset value and, as a result, all investors pay or receive the same price. Accordingly, we do not believe that investing in the same open-end mutual funds that we recommend to you constitutes a conflict of interest. ❖❖❖

12 Brokerage Practices

The Custodian and Broker We Use

SENESCHAL ADVISORS, LLC does not take custody of the investments we manage for you. Your investments must be held by a “qualified custodian” like a securities broker/dealer or a bank or trust company. We recommend that our clients use Charles Schwab & Co., Inc. (or “Schwab”) as their qualified custodian. Schwab is a registered securities broker/dealer and a member of SIPC.

We are an independently owned and operated business and are not affiliated with Schwab. Our clients’ investments are held in separate Schwab brokerage accounts registered in each client’s name. Schwab buys and sells securities when we or you direct them to. While we recommend that you use Schwab as your qualified custodian and broker, you may elect not to use Schwab. If you do elect to use Schwab, then you will be required to open a brokerage account with Schwab and enter into an account agreement with them. We do not open the account for you, although we do assist you in doing so. If you elect not to use Schwab, it may not be practical for us to manage your investments.

Even though our clients’ accounts are maintained at Schwab, we can still use other brokers to execute trades. Please read the “Your Brokerage and Custody Costs” discussion below for more information.

How we Select Brokers/Custodians

Our objective is to recommend and use a custodian/broker who will hold your investments and execute transactions on terms that are most advantageous to you in comparison to other custodians/brokers. In making our

recommendation we consider a number of factors, including:

- The combination of transaction execution services and asset custody services (generally, without paying an additional or separate fee for custody services)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate money transfers and payments to and from accounts such as wire transfers, check requests, bill payments
- Available investments like stocks, bonds, mutual funds, exchange traded funds
- Availability of investment research and tools that help us advise our clients
- Quality of service
- Cost effectiveness and competitiveness of commission rates, margin interest rates, and other fees and willingness to negotiate
- Industry reputation, financial strength, and stability
- Prior experience
- Availability of other products or services that benefit us and help us serve our clients

Your Brokerage and Custody Costs

Schwab generally does not charge separately for custody services. They are compensated by charging commissions or other fees on trades. Schwab’s commission rates applicable to our clients’ accounts are negotiated based on the aggregate value of client investments maintained at Schwab and the type and volume of transactions executed by Schwab. This arrangement benefits you because the commissions you pay are generally lower than you would pay dealing directly with Schwab.

In addition to commissions, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we execute with a

different broker/dealer and have settled to your Schwab account. These fees are in addition to the commissions paid to the executing broker/dealer. As a result, to minimize your trading costs, we execute most trades in your account through Schwab. We believe that executing most trades with Schwab is consistent with our duty to seek the best execution of your trades. Best execution means that you receive the most favorable terms for a transaction based on all relevant factors.

Products and Services Available to Us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like SENESCHAL ADVISORS, LLC. They provide us and our clients with access to their institutional brokerage services, like trading, custody, and reporting. Some of these services are not available to individual Schwab customers through the Schwab retail system.

Schwab also makes available to us various support services, such as training and education. Some support services help us manage or administer our clients' accounts more efficiently and effectively. Other support services are more focused on helping us to grow and manage our business. Schwab's support services generally are available to us on an unsolicited basis – i.e., we don't have to ask for them – and at no charge as long as client assets maintained at Schwab meet a certain minimum aggregate value. Schwab's current minimum aggregate asset requirement is \$10 million. If client assets in aggregate fail to meet Schwab's minimum requirement, then Schwab may charge us for support services. Schwab's current charge for support services is \$1,200 per quarter. At present, we meet Schwab's minimum aggregate client asset requirement and we do not pay for support services.

Following is a more detailed description of Schwab's support services:

Services that Directly Benefit You

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services that May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data, such as duplicate trade confirmations and account statements
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human resource consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third-party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment.

We use Schwab's services extensively, both those that benefit you directly and indirectly and those that generally only benefit us. The Schwab services we use include:

- Web-based technology that enables us to efficiently process trades and perform various cashiering functions like issuing checks to you or moving money between your accounts
- Access to institutional mutual funds typically not available to retail investment clients
- Web-based fixed income research and trading applications and a fixed income trading desk that enable us to screen, select and obtain competitive bids and offers on municipal, corporate and US Treasury and agency bonds
- Software and other technology that enables us to download and import client account transactions, securities positions and prices into our portfolio management and accounting system
- Software and web-based applications to upload our management fees for payment from client accounts
- Web-based applications that facilitates opening new accounts and transferring investments from other financial institutions

- Proprietary as well as third-party investment research
- On-line access to educational programs
- On-line access to technology, compliance and business consulting resources
- On-line access to human resource management resources that allow us to post open positions and develop HR programs to attract, train and retain employees
- Occasional informational or educational seminars or presentations, some of which provide free professional continuing education credit
- Discounts on third-party products, such as investment research and software

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services as long as the total of client assets held in custody meets Schwab's minimum aggregate requirement, currently \$10 million. Except for Schwab's minimum aggregate client assets requirement, these services are not contingent upon us committing to any specific amount of business to Schwab in terms of trading commissions or assets held in custody. Schwab's minimum aggregate client asset requirement may give us an incentive to recommend that you use Schwab as your qualified custodian based on our interest in receiving services that benefit us rather than on the basis of your interest in receiving the best value in custody services and best execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as your custodian and broker is in your best interest. Our selection is primarily supported by the scope, quality, and price of Schwab's services as more completely described in "How We Select Brokers/Custodians" above and not Schwab's services that benefit only us.



13 Review of Accounts

Portfolio Review Process

Most clients' investments are reviewed on a quarterly schedule; some are reviewed semi-annually or annually by mutual agreement. The purpose of our portfolio review is to ensure that your investments are being managed in accordance with your Investment Policy Statement. In addition, it may be necessary to perform an interim portfolio review of your portfolio between regularly scheduled reviews. Interim reviews are generally triggered by material changes in your financial or family situation indicating that a change in investment strategy is needed.

Portfolios are reviewed by our Managing Member, Jon M. Duncan.

Our regular review process begins with comparing your current portfolio asset allocation to your target asset allocation. Your target asset allocation is specified in your Investment Policy Statement. As the values of the investments held in your portfolio change in response to changing market conditions, your portfolio's actual asset allocation will vary. As a result it may be necessary to "rebalance" your portfolio. Rebalancing involves buying or selling securities in your portfolio to bring the actual asset allocation into alignment with your target asset allocation.

Rebalancing may trigger additional expenses and taxes. For example, selling an investment may result in a taxable capital gain. Moreover, when we trade in your account you incur transaction charges. When we review your portfolio and determine that rebalancing is necessary, we exercise our professional

judgment and discretion in trading, taking into consideration such factors as taxable gains and transaction costs.

As a rule, we review and rebalance your portfolio without your prior review. We believe that rebalancing your portfolio in a timely manner, in accordance with your IPS, is an essential part of the value we add and in your best interest. In all cases, however, you will receive transaction confirmation statements directly from Schwab and all transactions will be reviewed with you at your next portfolio review meeting.

If you have added any specific constraints or restrictions to your IPS, we make sure that they are being observed. For example, we make sure that only approved asset classes and types of investments are held in your portfolio.

While reviewing your portfolio we explicitly take income taxes into consideration. For example, we try to avoid selling any securities that may generate short-term capital gains. We also look for opportunities to "harvest" capital losses that may be used to shelter capital gains. Overlaying a tax review of your portfolio during our quarterly portfolio review process helps to increase your after-tax return.

Finally, we review the performance of your portfolio. The purpose of a performance review is to ensure that your portfolio is behaving as expected. For example, we compare the asset class returns of your portfolio to relevant benchmarks. A material variance in a particular asset class might indicate a need to analyze your holdings in that asset class more carefully.

Planning Review Process

Financial planning is a continuous process. Accordingly, we review your progress towards your financial goals with you typically once or twice per year during a quarterly portfolio review. We generally undertake a comprehensive review of client financial plans every two years. The objective of a bi-annual planning review is to make sure your financial plan still reflects your current financial and family situation and goals.

Quarterly Portfolio Reports

Each calendar quarter we provide you with a comprehensive portfolio report containing the following:

- Portfolio Statement
- Asset Allocation
- Fixed Income Summary
- Transaction Ledger
- Income Report
- Expense Report
- Realized Gains and Losses
- Portfolio Value vs. Net Cumulative Investment
- Calendar Year Returns
- Rolling Period Returns
- Billing Statement

Reports are generally distributed in the first week of each calendar quarter. We post your quarterly portfolio report to your password-protected client portal on our website for you to review. While we encourage all clients to use their client portal for report delivery, we will provide you with a printed paper report upon request.



14 Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services they make available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and related conflicts of interest are described above (see “Brokerage Practices” above). The availability to us of Schwab’s support products and services is not based on our giving any specific investment advice or product recommendation, such as purchasing specific securities.

In the normal course of our business we may receive new client referrals from other clients and professional advisors. While we may solicit and certainly welcome new client referrals, we do not directly or indirectly compensate referral sources.



15 Custody

We do not take custody of your investments. Schwab maintains actual custody of your assets. Under government regulations, however, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account or if you authorize us to move money from your account to another account registered in another name. You will receive account

statements directly from Schwab at least quarterly. They will be sent to the postal mailing address or email address you provide at the time of opening your account with Schwab. You should carefully review account statements when you receive them. We also urge you to compare your Schwab account statements with the quarterly reports that you receive from us.



16 Investment Discretion

Generally, we manage client investments on a discretionary basis. Discretionary management means that we exercise our best professional judgment to make decisions about what securities to buy and sell for your account as well as when, how much and at what price to buy and sell without your prior approval. Before assuming discretionary authority, however, we work with you to develop an Investment Policy Statement that clearly articulates your investment objectives, your asset allocation strategy, permitted asset classes and types of securities, and any specific constraints that you want to place on our management of your account.

We exercise our discretionary authority in managing your account pursuant to a limited power of attorney that you provide to us when you open your brokerage account with Schwab. You are not required to provide us with a limited power of authority, however. If you don't, then we will treat your account as non-discretionary and review all transactions in your account and obtain your approval before execution.

In some cases, as an accommodation to you we may agree to hold certain securities or cash in a separate account and not include them in your portfolio for management purposes. For example, you may own stock that you prefer not to sell to rebalance your portfolio. In such cases, we will treat assets designated by you as non-managed assets and will not include them in assets under management for fee calculation purposes. Accordingly, we will not sell any such assets without your prior direction and consent.



17 Voting Client Securities

When you own certain securities like stocks and mutual funds, you are entitled to vote at shareholder meetings either in person or by proxy. You may vote, for example, to elect members of the board of directors. In some cases, such as when a company reorganizes or when a mutual fund changes its investment policy, your vote may have a material impact on the value of your shares.

We do not vote your shares of securities held in your account nor do we provide advice on how to vote your shares. When you open your

Schwab brokerage account, Schwab is instructed to send all shareholder communications directly to you. We do not receive copies of any such communications. Therefore, the responsibility for voting your shares in all shareholder matters rests with you.

If you would like to read our Proxy Voting Policy, we would be pleased to provide you with a copy upon request. Please contact us using the contact information provided on the cover page of this brochure.



18 Financial Information

State of Washington securities law requires that advisors who require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, provide you with a balance sheet prepared in accordance with generally accepted accounting principles by an independent public accountant. While we do charge some advisory fees in advance at the beginning of each quarter, we do not charge fees more than three months in advance.

Accordingly, we are not required to provide a balance sheet.

SENESCHAL ADVISORS, LLC does not have any financial impairment that may preclude or prevent it from meeting all contractual commitments to clients. We are, however, a small, privately-owned business and, as such, the continuity of our operation is dependent upon the active participation of our principal owner and Managing Member, Jon M. Duncan. His disability or death may adversely affect our ability to meet our contractual commitments to clients but would not directly affect either the value of your investments held in custody at Schwab or your access to them.

In the event of a natural disaster, our ability to meet our contractual obligations to clients may be temporarily interrupted. To mitigate the risk of loss due to physical damage, client account documentation, investment policies, and critical business documents are scanned into secure digital files that are stored internally and remotely backed up on a nightly schedule.



19 Requirements for State-Registered Advisers

The principal executive officers and management personnel of the Firm are Jon M. Duncan, Managing Member and sole owner, and Jeffrey M. Lang, Director of Wealth Management. For more information about the education and business backgrounds of Mr. Duncan and Mr. Lang, please refer to the Brochure Supplements (Form ADV, Part 2B) included with this Firm Brochure.

None of the principal officers and management personnel of the Firm are actively engaged in any other business activity and no supervised persons are compensated for advisory services with performance-based fees.

No management person has been involved in an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 or in a civil, self-regulatory organization, or administrative proceeding.

No management person has any relationship or arrangement with any issuer of securities.



Brochure Supplement

(Form ADV, Part 2B)

This brochure supplement provides information about Jon M. Duncan (CRD #2121572) that supplements the Seneschal Advisors, LLC firm brochure. You should have received a copy of that brochure. Please contact Jon M. Duncan, Managing Member if you did not receive Seneschal Advisors, LLC's brochure or if you have any questions about this supplement.

Additional information about Seneschal Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.



*Seneschal Advisors, LLC
7350 Cirque Drive West
Suite 101
University Place, WA 98467
Phone: (253) 460-3430
Fax: (253) 565-0464
Email: info@seneschaladvisors.com
www.seneschaladvisors.com*

March 31, 2012

Jon M. Duncan, Managing Member

Year of Birth:

1948

Education:

Master of Business Administration (MBA) 1977
University of California
Berkeley, California

Bachelor of Arts (BA) 1970
Claremont McKenna College
Claremont, California

Professional Certification

CERTIFIED FINANCIAL PLANNER™ 1993

CERTIFIED FINANCIAL PLANNER™ practitioners
are licensed by the CFP Board of Standards, Inc.
Requirements for certification include:

- Completion of all financial planning education requirements established by the CFP Board of Standards, Inc. for initial certification
- Successful completion of a two-day, ten hour CFP® certification examination
- Three years of qualifying full-time work experience
- Compliance with the CFP Board of Standard, Inc.'s Code of Ethics and Professional Responsibility
- Completion of all continuing education requirements established by the Board of Standards, Inc. for certification renewal

Business Experience

September 2006 to Present
Managing Member & Chief Compliance Officer
Seneschal Advisors, LLC

May 2004 to August 2006
Managing Member
Jon M. Duncan, CFP®, LLC

February 2002 to April 2004
Director, Wealth Management
RSM McGladrey, Inc.

Disciplinary Information

None

Other Business Activities

None

Additional Compensation

None

Supervision

Jon M. Duncan, Managing Member & Chief Compliance Officer, supervises all advisory personnel.

Requirements for State-Registered Advisers

Jon M. Duncan has not been involved in an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 or in a civil, self-regulatory organization, or administrative proceeding, or been the subject of a bankruptcy petition.

Brochure Supplement

(Form ADV, Part 2B)

This brochure supplement provides information about Jeffrey M. Lang (CRD #2512108) that supplements the Seneschal Advisors, LLC firm brochure. You should have received a copy of that brochure. Please contact Jon M. Duncan, Managing Member if you did not receive Seneschal Advisors, LLC's brochure or if you have any questions about this supplement.

Additional information about Seneschal Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.



*Seneschal Advisors, LLC
7350 Cirque Drive West
Suite 101
University Place, WA 98467
Phone: (253) 460-3430
Fax: (253) 565-0464
Email: info@seneschaladvisors.com
www.seneschaladvisors.com*

March 31, 2012

Jeffrey M. Lang, Director of Wealth Management

Year of Birth:

1971

Education:

Master of Business Administration (MBA) 2009
California State University
Dominguez Hills, California

Bachelor of Arts (BA) 1993
Washington State University
Pullman, Washington

Professional Certification

CERTIFIED FINANCIAL PLANNER™ 2003

CERTIFIED FINANCIAL PLANNER™ practitioners
are licensed by the CFP Board of Standards, Inc.
Requirements for certification include:

- Completion of all financial planning education requirements established by the CFP Board of Standards, Inc. for initial certification
- Successful completion of a two-day, ten hour CFP® certification examination
- Three years of qualifying full-time work experience
- Compliance with the CFP Board of Standard, Inc.'s Code of Ethics and Professional Responsibility
- Completion of all continuing education requirements established by the Board of Standards, Inc. for certification renewal

Business Experience

January 2012 to Present
Director of Wealth Management
Seneschal Advisors, LLC

October 1995 to January 2012
Branch Manager
Charles Schwab & Co., Inc.

Disciplinary Information

None

Other Business Activities

None

Additional Compensation

None

Supervision

Mr. Lang is supervised by the Firm's Managing Member & Chief Compliance Officer, Jon M. Duncan

Requirements for State-Registered Advisers

Jeffrey M. Lang has not been involved in an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 or in a civil, self-regulatory organization, or administrative proceeding, or been the subject of a bankruptcy petition.