

The Eastrade Asset Management Corporation

**Ten Fuller Road
Briarcliff Manor, New York 10510**

Phone: 914-762-5457

Fax: 914-762-5457

Email: TEAMCORPRIA@msn.com

January 22, 2024

FORM ADV PART 2A. BROCHURE

This brochure provides information about the qualifications and business practices of The Eastrade Asset Management Corporation. If you have any questions about the contents of this brochure, please contact us at 914-762-5457. 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 The Eastrade Asset Management Corporation is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for The Eastrade Asset Management Corporation is 124232.

The Eastrade Asset Management Corporation is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Material Changes

Form ADV Part 2A, Item 2

Since the last annual updating amendment of this Form ADV Part 2, dated February 8, 2023, there have been no material changes.

Please note that this section only discusses changes we deem material and does not cover all changes made.

Table of Contents

<i>Material Changes</i>	2
<i>Table of Contents</i>	3
<i>Advisory Business</i>	4
<i>Fees and Compensation</i>	4
<i>Performance-Based Fees and Side-By-Side Management</i>	5
<i>Types of Clients</i>	5
<i>Methods of Analysis, Investment Strategies and Risk of Loss</i>	5
<i>Disciplinary Information</i>	6
<i>Other Financial Industry Activities and Affiliations</i>	6
<i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</i>	6
<i>Brokerage Practices</i>	8
<i>Review of Accounts</i>	8
<i>Client Referrals and Other Compensation</i>	8
<i>Custody</i>	9
<i>Investment Discretion</i>	9
<i>Voting Client Securities</i>	9
<i>Financial Information</i>	9

Advisory Business

Form ADV Part 2A, Item 4

The Eastrade Asset Management Corporation's registration was granted by the New York State Attorney General, Department of Law on August 6, 1997 and on March 5, 2021 by the U.S. Securities and Exchange Commission. Michael Roger Dymant (CRD Number 4623996) is President and sole shareholder/equity owner of the firm. Mr. Dymant is the Chief Compliance Officer of the firm. The firm is not publicly owned or traded. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions. The firm does not sponsor any wrap program. As of December 31, 2023, the firm managed assets on a discretionary basis in the amount of \$28,911,514 and managed on a nondiscretionary basis \$0.

Approximately ninety-nine (99%) percent of the firm's professional time and advisory billings shall be attributable to the provision of investment supervisory services to clients. Specifically, the firm will provide asset management services to clients on both a discretionary and non-discretionary basis. Fees are payable quarterly in arrears upon receipt of invoice. No fees are prepaid. Fees for assets under management in excess of \$1,000,000 are negotiable. No fees are based on capital gains or capital appreciation of assets. The professional relationship may be terminated by either the firm or client upon 30 days written notice served upon the other party.

Approximately one (1%) percent of the firm's advisory billings shall be attributable to involvement in "special consulting projects". In essence, the firm will consult with certain clients on specific investment advisory related issues, and bill on a flat fee or hourly fee basis. The fee shall be payable upon completion of the consultation work and shall not be based on capital gains or capital appreciation of assets. It shall be negotiable and shall be based on the anticipated complexity of the case. The flat fee shall be between \$1,000 and \$4,000. The hourly fee shall be between \$100 and \$250 per hour. The exact fee selected shall be based on the individual facts and circumstances of the case.

Fees and Compensation

Form ADV Part 2A, Item 5

The asset management fee schedule is as follows:

<u>Assets Under Management</u>	<u>Annual Fee</u>
Up to \$100,000	1.75%.
\$100,001 to \$500,000	1.50%
\$500,001 to \$750,000	1.25%
750,001 to \$1,000,000	1.00%
\$1,000,000 and above	Negotiable

No fees are based on capital gains or capital appreciation of assets. The professional relationship may be terminated by either the firm or client upon 30 days written notice served upon the other party.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

The firm does not base any fees upon capital gains or upon capital appreciation of assets.

Types of Clients

Form ADV Part 2A, Item 7

Individuals, Pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. We do not have a minimum account size requirement.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

The method of securities analysis used by the firm is fundamental analysis. Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Investment strategies used by the firm are long term purchases (securities held at least a year) and short term purchases (securities sold within a year).

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Risks Associated with Securities

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by

losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

Disciplinary Information

Form ADV Part 2A, Item 9

There are no disciplinary events to report.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

None.

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

Form ADV Part 2A, Item 11

Firm has adopted a written Code of Ethics in compliance with SEC rule 204A-1. The code sets forth standards of conduct and requires compliance with federal and state securities laws. Our code also addresses personal securities trading and requires our personnel to report their personal securities holdings and transactions. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Firm may own, purchase or sell same or similar securities as those of the Client. This is disclosed prior to the signing of the Financial Advisory and/or Investment Management Agreement. In addition, Client uses best efforts to make sure that the terms of the Client's transactions involving such securities are at least as favorable as those which the Firm participates in. In the unlikely event that the interests of the Firm's account would happen to correspond with an advisory client's interests, full disclosure would be made to such client at once. Records will be maintained of all securities bought or sold by the Firm and will be available for Client inspection upon request should it be determined by Firm that any potential conflict of interest may exist.

It is the express policy of Firm that no person employed by Firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

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

- 1) A director, officer or employee of Firm shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No associated person of Firm shall prefer his or her own interest to that of the advisory client.
- 2) Firm maintains a list of all securities holdings for itself, and anyone associated with this advisory practice. These holdings are reviewed on a regular basis by Michael Roger Dymant.

- 3) Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- 4) Any individual not in observance of the above may be subject to termination.

Firm is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Firm has adopted a firm wide policy statement outlining insider trading compliance by Firm and its associated persons and other employees of Firm, and said statement has been reviewed, dated and signed by each such person. A copy of such firm wide policy is left with such person and the original is maintained in a master file. Further, Firm has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and other employees of Firm, are signed, dated and filed with insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which Firm's employees, if any, may have non-public information, (4) requiring all of Firm's employees, if any, to conduct their trading through a specified broker or reporting all transactions promptly to Firm, and (5) monitoring the securities trading of the firm and its employees and associated persons.

Investment Advice Relating to Retirement Accounts

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

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

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

Brokerage Practices

Form ADV Part 2A, Item 12

Factors Used to Select Custodians and/or Broker-Dealers

We do not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction, and this may cost clients' money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments, we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Review of Accounts

Form ADV Part 2A, Item 13

With regard to asset management activities, the firm will see that a quarterly review statement is provided to the client. Such statement will reflect account balance and activity. With respect to the "per project" type of case, an annual review will be encouraged. All review activity shall be undertaken by Michael R. Dymant.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

None.

Custody

Form ADV Part 2A, Item 15

The firm does not have custody of any client cash or securities.

Investment Discretion

Form ADV Part 2A, Item 16

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Voting Client Securities

Form ADV Part 2A, Item 17

The firm does not vote proxy statements on behalf of any advisory clients.

Financial Information

Form ADV Part 2A, Item 18

No financial reporting is required as the firm does not receive fees more than six months in advance, has never filed a Petition in Bankruptcy and is not in a precarious financial position.