

## **Part 2A of Form ADV Asset Management: Firm Brochure**

St. Louis Financial Planners Asset Management  
16091 Swingley Ridge Rd. Ste 345  
Chesterfield, MO 63017

Telephone: 636-532-3900  
Email: [info@stlfp.com](mailto:info@stlfp.com)  
Web Address: [www.stlfp.com](http://www.stlfp.com)

April 29, 2024

St. Louis Financial Planners Asset Management LLC (STLFPAM). This brochure provides information about the qualifications and business practices of St. Louis Financial Planners Asset Management LLC.

If you have any questions about the contents of this brochure, please contact us at 636-532-3900. 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 STLFPAM is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can access this information by a unique identifying number, known as a CRD number. Our firm's CRD number is 106999.

## **Item 2 Material Changes**

This Brochure, dated April 29, 2024 (this “Brochure”), is our new disclosure document prepared according to the SEC's new requirements and rules. This Brochure is an update to the firm Brochure dated January 8, 2024.

- Updated assets under management

Consistent with the new rules, we may provide additional ongoing disclosure information about material changes to you, including a revised Brochure, as necessary based on changes or new information. We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business fiscal year.

## Part 2A of Form ADV Asset Management: Firm Brochure

### Contents

Item 2 Material Changes .....	2
Item 4 Advisory Business.....	4
Item 5 Fees and Compensation .....	5
Item 6 Performance-Based Fees and Side-By-Side Management .....	5
Item 7 Types of Clients .....	6
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Method of Analysis.....	6
Investment Strategies.....	6
Risk of Loss .....	7
Item 9 Disciplinary Information .....	8
Item 10 Other Financial Industry Activities and Affiliations .....	8
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	8
Item 12 Brokerage Practices.....	9
Item 13 Review of Accounts.....	9
Item 14 Client Referrals and Other Compensation.....	10
Item 15 Custody .....	10
Item 16 Investment Discretion .....	10
Item 17 Voting Client Securities .....	10
Item 18 Financial Information .....	11

## **Item 4 Advisory Business**

St. Louis Financial Planners Asset Management LLC (STLFPAM) provides discretionary advisory services to individuals, high net worth individuals, pension and profit-sharing plans, charitable organizations, and corporations or other businesses. STLFPAM was formed in the state of Missouri and has been a registered investment adviser since 1996. Adviser provides portfolio management, selection of other advisers, and active management services, and/or the selection of other third-party managers.

STLFPAM provides active management advice in mutual funds and exchange traded funds (ETFs). As opposed to buy and hold strategies, active management is the process of constantly monitoring potential investments and making periodic changes to the portfolio. The management service is performed on a discretionary basis; however, STLFPAM does not have custody of the client's funds or securities. STLFPAM offers different models of investment strategies.

STLFPAM clientele consists of investment advisers that have arrangements to market the services of STLFPAM. Investment advisers meet with individual clients to determine the best adviser service for their needs. Investment advisers will determine investment objectives, risk tolerance, net worth, and suitability for the best services offered by STLFPAM to meet their individual client's needs. The portfolio selected for the client is customized to their individual risk/return need.

STLFPAM also provides active management services under the Full Discretion Advisory Agreement whereas the Client appoints STLFPAM to undertake such investment supervisory services as STLFPAM deems appropriate for the Client in one or more management programs or mutual funds /ETFs. Client appoints STLFPAM to select management program(s), program signals, appoint sub-advisors, and from time to time reallocate funds among such program(s) and/or third-party manager(s) according to clients predetermined risk.

As of December 31, 2023, STLFPAM was actively managing \$129,904,284 of clients' assets on a discretionary basis.

Principal Owners and Executive Officers are:

Timothy D. Hunt	President	50%
Casey D. Hunt	Vice-President	50%

## Item 5 Fees and Compensation

### Fee Schedule

\$50,000 and less	2.50% of the Account
\$50,000.01 - \$100,000	2.25% of the Account
\$100,000.01 - \$500,000	2.00% of the Account
\$500,000.01 and greater	1.75% of the Account

Casey Hunt currently provides advisory services for 137 clients

Timothy Hunt currently provides advisory services for 200 clients

Matthew Jarrell currently provides advisory services for 93 clients

The annual fee listed above shall be paid in arrears on a quarterly basis and calculated using the average daily account balance.

AXOS Advisor Services has NO trading costs or equity execution fees.

STLFPAM uses a platform of exchange traded funds (ETFs), individual equities and no-load index funds. STLFPAM retains the right to negotiate fees at its own discretion. Adviser retains the right to modify the fee schedule for future agreement years by notifying the client thirty days before the effective date of any modification. Fees are calculated and payable in arrears, they are deducted quarterly. STLFPAM will deduct the fees from the clients' assets. STLFPAM's advisory client has the right to terminate the contract without penalty at any time. Upon termination of the advisory agreement, fees will be prorated to the number of days in which the client received STLFPAM service. Clients are under no obligation to act on the investment adviser recommendations. The client is under no obligation to affect the transaction through the company/custodian STLFPAM has recommended and has the option to purchase investment products through other brokers or agents that are not affiliated with STLFPAM.

AXOS Advisor Services has a \$75 fee when an account is closed or liquidated. There are no fees for an ACH or wire payments to client's bank account. There is a \$20 fee for overnight service.

Client statements for Casey Hunt, Timothy Hunt and Matthew Jarrell are prepared by AXOS Advisor Services. AXOS charges an account custody fee. This custody fee is paid for by STLFPAM. The fee covers statement generation, performance reporting, website account access, advanced trading technologies, and for no trading costs. AXOS may also receive 12b-1 and/or shareholder services mutual fund fee revenue for some mutual fund share positions held in the client's accounts. Other mutual funds could have a \$19.99 cost to buy or sell but those funds are not utilized in any active strategy.

To reflect the management between STLFP and STLFPAM, both companies have entered into a Revenue, Services and Expense Sharing Agreement providing for the payment by STLFPAM to STLFP of approximately one-half (50%) of all revenue derived from referred clients as well as the payment of mutually agreed upon expenses and salaries of STLFP.

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

Investment Advisers of STLFPAM do not charge performance-based fees.

## **Item 7 Types of Clients**

STLFPAM provides investment advice to individuals, trusts, 401k, pension and profit-sharing plans, charitable organizations, corporations, or business entities other than those listed above.

STLFPAM has no minimum account size.

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

### **Method of Analysis**

St. Louis Financial Planners Asset Management, LLC utilizes primarily technical analysis as its method of research and investment model management. Technical Analysis is the study of the market action itself as measured by market price. Market charts are used to identify the dominate trends, support and resistance levels in the major market indices, ETFs, and individual securities. The investment vehicles used are exchange traded funds (ETFs), individual equities, and no-load index mutual funds.

### **Investment Strategies**

#### *Dynamic Asset Allocation and Dynamic Equity Models*

Dynamic Asset Allocation Models seek growth of capital with an emphasis on controlling risk through the use of proprietary technical systems that can seek money market or cash when the support, resistance, and trend following models dictate. Utilizes traditional equity indexed ETFs, mutual funds, and individual equities. The Dynamic Asset Allocation Models will incorporate multiple asset classes and utilize strategies of long, intermediate, and short-term active portfolio management programs based upon large, mid, and small company indices, ETFs, sectors, fixed income, gold, commodities, and individual equities.

#### *Tactical Rotation and Equity Rotation*

These Models seek an objective of growth of capital by owning the leading indexed asset class, sector mutual funds/ETFs, and individual equities through the use of proprietary technical indicators. These models employ a relative strength ranking system that actively rotates in and out of ETFs, mutual funds, and individual equities. Through the utilization of long and intermediate term strategies, we monitor the securities daily and rotate into the investments style exhibiting relative strength over various time frames. Unlike the Dynamic Asset Allocation model, these models will not seek money market or cash, but rather remain fully invested at all times.

## Part 2A of Form ADV Asset Management: Firm Brochure

### *Equity Momentum, Sector Momentum, Momentum, and Dividend Equity*

These Models seek an objective of growth of capital by owning the leading individual equities and ETFs through the use of proprietary ranking methodology. The Dividend model seeks both growth and income. These models employ a Momentum ranking system that actively rotates in and out of individual equities and ETFs. Through the utilization of long and intermediate term strategies, we monitor the securities monthly/quarterly and rotate into the investments exhibiting relative strength over various time frames. Unlike the Dynamic Asset Allocation model, these models will not seek money market or cash, but rather remain fully invested at all times.

### *Strategic and Global Asset Allocation Models*

A fully diversified buy and hold strategy. In order to reduce the correlation of the client's holdings to the U.S. stock markets, these models may have exposure to international, emerging markets, fixed income, and commodity ETFs. The Client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. In order to remain consistent with the asset allocation and portfolio holdings, each model will be reviewed and monitored on a quarterly basis. Deviations or tolerance bands will be utilized in order to keep the portfolio allocations within the objective guidelines. Rebalancing of the portfolio will typically occur on an annual basis or no more frequent than deemed necessary.

The client, after consultation with the STLFPAM representative, may participate in more than one model at a time all within the same account.

### *Dynamic Leveraged*

Purchases leveraged equity indexed mutual funds and ETFs that seek to provide investment returns, before fees and expenses, up to 200% of the daily indexed benchmark's return. This strategy will exhibit higher levels of risk and volatility than seen in traditional portfolio construction. The Dynamic Leverage Models incorporate multiple strategies of long and intermediate term active portfolio management programs based upon large, mid and small company indices. The model employs proprietary tactical strategies that can seek the safety of money market when the support, resistance, and trend following systems issue sell signals. Due to the daily reset of the leverage, there is an increased risk of accelerated losses in excess of twice the market when the ETF declines.

## **Risk of Loss**

Because our strategies invest in equity securities, fixed income, and commodity ETFs, there naturally exists a risk of loss to capital. In an attempt to reduce the risk of loss, our Dynamic Asset Allocation strategies will utilize propriety signals to

## **Part 2A of Form ADV Asset Management: Firm Brochure**

seek Money Market or cash on sell signal. These defensive measures seek to minimize the risk and volatility associated with investing in the stock market.

### **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

The Principal Executive Officers of STLFPAM are also Principal Executive Officers of St. Louis Financial Planners, Inc., a financial planning and registered investment adviser.

Matthew Jarrell is a registered investment adviser for St. Louis Financial Planners, Inc.

St. Louis Financial Planners, Inc. and STLFPAM share the same office space.

Representatives of STLFPAM also sell life insurance and annuities through Brokerage Unlimited for which they receive a commission.

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

This Code establishes rules of conduct for all employees of STLFPAM and is designed to protect, among other things, the confidentiality of client information and establish compliance procedures ensuring best practices. The Code is based upon the principal that STLFPAM and its employees owe a fiduciary duty to their clients to conduct their affairs as to avoid serving their own personal interests ahead of clients, including their personal securities transactions, in such a manner as to avoid serving their own personal interests ahead of clients, not taking inappropriate advantage of their position with the firm and any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards are maintained by STLFPAM continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

STLFPAM and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that STLFPAM has an affirmative duty of utmost good faith to act solely in the best interest of its clients. We prohibit any incentives or rewards that might



## **Part 2A of Form ADV Asset Management: Firm Brochure**

encourage any advisor or employees to not act in the client's best interest. Advisors and employees of STLFPAM may own and trade in the same securities for their personal accounts as they do for their clients.

STLFPAM and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided.
- The duty to obtain best execution for a client's transactions where the Firm is in a position to direct brokerage transactions for the client.
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances.
- A duty to be loyal to clients. Never put our financial interests ahead of your when making recommendations.
- Prudent advice - Meet a professional standard of care when making investment recommendations.
- Avoid misleading statement 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 meeting its fiduciary responsibilities to its clients, STLFPAM expects every employee to demonstrate the highest standards of ethical conduct for continued employment. Strict compliance with the provisions of the Code shall be considered a basic condition of employment. STLFPAM's reputation for fair and honest dealings with its clients has taken considerable time to build. This standing could be seriously damaged as the result of even a single securities transaction being considered questionable in light of the fiduciary duty owed to our clients. 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 (ERISA) and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

A copy of STLFPAM's Code of Ethics is available upon request.

### **Item 12 Brokerage Practices**

The client in its advisory agreement with STLFPAM grants STLFPAM or designated sub-advisor discretionary authority over the account with regard to the securities to be bought or sold in the account and the amount of the securities to be bought or sold.

STLFPAM compensates representatives of St. Louis Financial Planners, Inc. for clients utilizing their service. This referral arrangement does not result in any additional charge or fee to the client from STLFPAM.

### **Item 13 Review of Accounts**

All Dynamic and Tactical Rotation accounts will be reviewed on a daily basis. Dividend Equity, Momentum, Strategic and Global Asset Allocation Models will be reviewed quarterly. Overall account positions will be reviewed on a quarterly basis to determine their ability to meet client goals and objectives. Actions that may trigger changes in accounts include, but or

## **Part 2A of Form ADV Asset Management: Firm Brochure**

not limited to, relevant financial events, market activity or indicators from STLFPAM's proprietary technically derived signals.

If investment policies of any investment vehicle become inappropriate for the STLFPAM's management program, client accounts will be traded.

In addition to regular audit procedures performed by administrative staff or outside services, reviews may be conducted by officers of STLFPAM (Tim and Casey Hunt) and designated representatives (Matt Jarrell). Accounts will be reviewed for performance and client objectives. There are no assignment limits for any associate of STLFPAM.

In addition to the quarterly reports provided by the custodian of the account, clients will receive quarterly statements showing aggregate market value of the account and annual performance reports. A market report discussing general market conditions and management viewpoint will be sent as advisers feel necessary.

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

St. Louis Financial Planners, Inc. refers clients to STLFPAM for discretionary advisory services. STLFPAM advisers will provide portfolio management, selection of other advisers, and active management service.

### **Item 15 Custody**

STLFPAM does not have custody of client's accounts. The custodian for client accounts is AXOS Advisor Services.

### **Item 16 Investment Discretion**

The client in its advisory agreement with STLFPAM, grants to STLFPAM or designated sub-advisor discretionary authority over the account to place trades in the account without contacting the client prior to each trade to obtain the clients permission. Our discretionary authority includes the ability to determine the security to buy or sell and to determine the amount of the security to buy or sell. Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

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

STLFPAM does not have the authority to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or fund. Clients may contact STLFPAM regarding any solicitation they receive regarding their account.

## **Item 18 Financial Information**

STLFPAM does not require or solicit prepayment of fees.

STLFPAM has not been the subject of a bankruptcy petition at any time.