

Firm Brochure

(Form ADV, Part 2A)

This brochure provides information about the qualifications and business practices of Seneschal Advisors, LLC DBA Seneschal Family Office (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@seneschalfamilyoffice.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 DBA Seneschal Family Office also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 131618.

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



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March 27, 2024

Item 2 Material Changes

This Firm Brochure is our disclosure document prepared in accordance with Securities and Exchange Commission requirements and rules.

This Item is used to provide a summary of new and/or updated information. We will inform you of revision(s) based on the nature of the updated information.

Consistent with SEC rules, 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. Furthermore, we will provide you with other interim disclosures about material changes, as necessary.

The last filing of this Firm Brochure was July 12, 2023. This section summarizes material changes since July 12, 2023.

Item 1 Firm Brochure

Seneschal Family Office updated their contact and website information.

Item 4 Advisory Business

Seneschal Family Office updated services offered as well as assets under management as of December 31, 2023.

Item 5 Fees and Compensation

Seneschal Family Office amended the fees associated with service levels offered.

Item 7 Types of Clients

Seneschal Family Office amended the recommended minimum assets under management for particular service levels.

Item 10 Other Financial Industry Activities and Affiliations

Seneschal Family Office disclosed our recommendation of third-party managers.

Item 15 Custody

Seneschal Family Office added custodial arrangements regarding held away assets.

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Item 4 Advisory Business

Services We Provide

Seneschal Advisors, LLC DBA Seneschal Family Office 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. In July 2023, we began doing business under the registered trade name of Seneschal Family Office. The owners of Seneschal Advisors, LLC DBA Seneschal Family Office as of December 31, 2023, are Jeffrey M. Lang, Candace E. Duecker, Tania P. Kaarvand, and Jon M. Duncan.

Seneschal Family Office 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

Financial planning is the process of comprehensively evaluating a client's current and future financial position, using currently known variables to project future cash flows, asset values and withdrawal plans. Our Wealth Advisors are CERTIFIED FINANCIAL

PLANNER™ professionals required to adhere to a specific financial planning process as it relates to the unique needs of each client they serve. Through the financial planning process, all questions, information and analysis are considered as they may impact, or could be impacted, by the entire financial and life situation of the client. Clients purchasing our financial planning services will receive a written report providing a detailed financial plan designed to assist them in achieving long-term financial goals and objectives. Since each client is different, the services we provide will vary from client to client. In the same way, our advice will vary from client to client.

Depending upon your needs and circumstances, our advice may cover some or all of the following financial planning subject areas. The Client and Wealth Advisor will work together to determine specific areas to cover. These areas may include, but are not limited to the following:

- Cash Flow, Debt Management, and Liquidity Planning
- Risk Management and Insurance
- Education Planning
- Retirement and Financial Independence Planning
- Estate Planning
- Investment Analysis and Planning
- Integrated Tax and Financial Planning

In general, our financial planning process includes:

- Meeting with you to clarify your financial and life goals and establishing a mutually agreeable work plan and fee.
- Determining the data required to do our work and providing you with a list of documents and other details we will need to gather for your financial plan.
- Preparing a Preliminary Analysis of your current financial situation, including the preparation of financial statements and a review of family records, budgeting and cash flow, and personal liabilities. We may also review estate planning and legal documents, employee benefits, insurance policies, and tax returns. We may also evaluate the impact of disability and long-term care on achieving your goals.
- Meeting with you to review our Preliminary Analysis and providing you an opportunity to reassess your goals as necessary and identify planning areas most in need of your attention.
- Performing a Detailed Analysis of alternative planning strategies that can highlight options available to you and potentially increase the probability of success in reaching your goals.
- 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.

While we would be pleased to assist you, implementation of financial planning recommendations is entirely at your discretion.

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 objectives, time frame for investing, risk tolerance, liquidity needs, asset allocation strategy, specific constraints and preferences, and procedures for managing and periodically rebalancing your portfolio.
- As appropriate, we may also review and discuss your prior investment history, as well as family composition and background.
- 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 investments 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 can incorporate any specific constraints, restrictions or preferences that you want us to observe in managing your investment portfolio.

Some types of investments may involve certain additional degrees of risk. To the extent that such investments are recommended or used to implement your investment plan, we will only do so when suitable and consistent with your stated investment objectives, tolerance for risk, and liquidity needs. 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.

We provide investment advice in regard to subaccounts inside certain annuities,

but do not provide advice pertaining to the insurance portion of the product.

Types of Engagements

The scope of work, the fees to be charged, timing, and our respective responsibilities are clarified in writing for all engagements prior to engagement.

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

Limited Scope Consulting Engagements

A Limited Scope Consulting engagement is generally focused on one or a few financial planning subject areas. We will meet with you prior to engagement to clarify your objectives, the scope of our work, fees, and we will provide you with a written agreement. Each limited scope engagement is tailored to address the specific needs and circumstances of the client. Services that may be discussed with you and quoted separately include strategic wealth planning, specialized wealth planning, family continuity planning, and other special projects. Investment advisory services, paid personal income tax filing fees, and administrative services are generally not offered at this service level.

Wealth Management Engagements

In a Wealth Management engagement, we assist you in developing an ongoing 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 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 ongoing discretionary basis in accordance with your investment policy (see “Investment Management Services” above).

This level of engagement includes two wealth planning meetings per year that are initiated and scheduled by Seneschal Family Office, with additional meetings available to you as needed and requested by you. The scope of this service offering is limited to core strategic wealth planning and up to two other specialized wealth planning areas as designated by you and your adviser on an annual basis. It also includes administrative services and investment advisory services. Additional services that may be discussed with you and quoted separately include family continuity planning and other special projects. Paid personal income tax filing fees are generally not offered at this service level.

Comprehensive Wealth Management Engagements

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 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 ongoing discretionary basis in accordance with your investment policy (see “Investment Management Services” above). This level of engagement includes three wealth planning meetings per year that are initiated and scheduled by Seneschal Family Office, with additional meetings available to you as needed and requested by you. Also included in this level of engagement are administrative services, investment advisory services, and strategic and specialized wealth planning encompassing all planning topics. Additional services that may be discussed with you and quoted separately include family continuity planning and special projects. Paid personal income tax filing fees are generally not offered at this service level.

Family Office Services Engagements

In a Family Office Services 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 ongoing discretionary basis in accordance with your investment policy (see “Investment Management Services” above). This level

of engagement includes four meetings (or more as requested by you) per year, and per household in the case of multi-household families. In addition, this level of engagement includes administrative services, investment advisory services, strategic and specialized wealth planning encompassing all planning topics, personal income tax filing fees up to \$10,000, and family continuity planning. Special projects will be quoted separately.

Use of Independent Managers

Seneschal Family Office may select certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

Seneschal Family Office evaluates a variety of information about Independent Managers, which includes the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves, and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers' investment strategies, past performance, and risk results in relation to its clients' individual portfolio allocations and risk exposure. Seneschal Family Office also takes into consideration each Independent Manager's management style, returns,

reputation, financial strength, reporting, pricing, and research capabilities, among other factors.

On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. Seneschal Family Office seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Held Away Account Management

Seneschal Family Office uses a third-party platform to facilitate management of held away assets including but not limited to: 401(k), 403(b), 401(a), HSA, VEBA, 414(h) and 457(b) and (f), with discretion or with prior Client approval, as agreed upon at the time of engagement. Clients may engage us for this additional service regardless of their engagement level for an additional fee. Seneschal Family Office is not considered to have custody of Client funds since our log-in access to effect trades on behalf of the client is unique to Seneschal Family Office, and we cannot disburse funds. Our authority is limited to rebalancing and submitting trade requests. Seneschal Family Office is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once the Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk

tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least annually, and allocation changes will be made as deemed necessary.

Assets Under Management

The following table summarizes the total assets managed and supervised by Seneschal Advisors, LLC DBA Seneschal Family Office as of December 31, 2023:

Assets Under Management (Discretionary)	\$244,646,831
Assets Under Management (Non-Discretionary)	\$0
Total Assets Under Management	\$244,646,831

Item 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).

Limited Scope Consulting Fees

Limited Scope Consulting Fees are quoted as a flat fee based on the scope of the services to be provided.

Wealth Management Fees

Wealth Management Fees are 0.90% annually of assets under management, in addition to any quoted services not included in this service level.

Comprehensive Wealth Management Fees

Comprehensive Wealth Management Fees are 0.35% annually of assets under management, in addition to a fixed fee starting at \$15,000, as negotiated, and any quoted services not included in this service level.

Family Office Services Fees

Family Office Services Fees are 0.25% annually of assets under management, in addition to a fixed fee starting at \$25,000 as negotiated and any quoted services not included in this service level. Fixed fee portions of this fee may be shared and allocated among multi-household families.

Payment of Fees

Fees paid as a percentage of assets under management, not including the additional fees quoted that are not included in each service level, are calculated as a percentage

of assets under management per year, billed in advance quarterly at the beginning of each calendar quarter based on the value of assets managed as of the end of the previous quarter. Fixed fees shall be paid in addition to the AUM fee. **Fixed fees shall be escalated by 3% on an annual basis if the client remains within their current service level.** For example, if the fixed fee for the client is \$15,000 for client’s first year of services, it will be \$15,450 for client’s second year of service unless the fixed fee has been renegotiated. Fixed fees may be negotiated and determined by household within a family relationship. The combined assets under management and fixed fee, exclusive of any additional quoted services below, shall never be an amount more than 1.00% of assets under management.

Held Away Management Fees

When advising individuals on held away assets including but not limited to: 401(k), 403(b), 401(a), HSA, VEBA, 414(h) and 457(b) and (f), we will utilize an unaffiliated platform described in Item 4 above. This platform will directly charge us for use of their platform. For the portion of your portfolio “held away” on this platform under our management, we will charge a management fee of 1.00% annually, billed in advance quarterly at the beginning of each calendar quarter based on the value of assets managed as of the end of the previous quarter. The Adviser shall remit .30% of such fee to the platform with .70% retained as compensation for Adviser’s management services.

As it is impossible to directly debit your asset-based advisory fees from qualified accounts (as defined below in Item 15, Custody), those fees will be assigned to the client's nonqualified and/or IRA accounts being managed by Adviser, as determined with Adviser upon engagement of this service. If the client does not have a non-qualified or IRA account under Adviser's management, those fees will be billed directly to the client. If there are insufficient funds available in another account or if we believe that deducting the fee from another account would be prohibited by applicable law, we will invoice the Client. Adviser retains the right to terminate this service by notice in writing to the Client if the fee for these services remains unpaid by the date of the next billing cycle.

Termination of the Advisory Relationship

You may terminate your Investment Advisory Services Agreement with us at any time by written notice without penalty. For Wealth Management, Comprehensive Wealth Management, and Family Office Services engagements, unearned investment advisory fees will be refunded to you as soon as practically possible. For Limited Scope Consulting engagements, any unbilled planning fees will be billed to you, and you will be given a 30-day grace period to pay them. Since consulting fees are billed and paid after services are rendered, refunds generally are not made.

Advisory Service Agreements are specifically executed by and between you and Seneschal Advisors, LLC DBA Seneschal Family Office. They may not be assigned to another party without your and our prior approval.

If you do not receive a copy of our disclosure brochure (ADV Part 2) at least 48 hours prior to signing an Advisory Services Agreement, you may terminate your contract without penalty within five (5) business days of entering into it.

Limited Negotiability of Advisory Fees

Although Seneschal Advisors, LLC DBA Seneschal Family Office has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These factors include, but are not limited to, the complexity of the client's personal financial situation and goals; assets to be placed under management and anticipated future additional assets; related accounts; investment policy and account composition; and reporting requirements. In all cases, the annual fee schedule is specified in the contract between us and each client.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

Mutual Fund and Exchange Traded Fund Fees

In addition to our advisory fees, you will incur management fees and other operating expense charges imposed by mutual funds and ETFs in which you invest. These fees and expenses vary from fund to fund depending upon the type and nature of the fund. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible

distribution fee. Some funds also impose sales charges ("loaded funds"), and, to the extent that they do, a client may pay an initial or deferred sales charge. Seneschal Family Office, however, does not use loaded mutual funds.

If you chose to do so, you could invest directly in a mutual fund or ETF, without our services. In that case, you would not receive the services provided by our firm which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate considering your financial condition, risk tolerance and investment objectives. Accordingly, you should review both the fees charged by the funds we recommend and our fees to fully understand the total amount of fees you will pay and to thereby evaluate the advisory services provided by us. In selecting mutual funds and ETFs, we explicitly consider fund fees and expenses and seek to minimize them. We do not benefit, directly or indirectly, from any mutual fund or ETF 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 DBA Seneschal Family Office 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."

Separately Managed Account Fees

In a separately managed account arrangement, clients may be charged program or management fees in addition to the investment advisory fee charged by our firm. Such fees may include, but not be limited to, the investment advisory fees of the other investment advisers or money managers managing the separate account. In evaluating such an arrangement, investors should also consider that the separately managed account may or may not exceed the aggregate cost of such services if they were to be provided separately. Additional information regarding fees and expenses related to third-party or separately managed accounts may be found in the disclosure brochure of the respective manager or disclosure documents of an outside program selected by the client.

Wrap Fee Programs

Seneschal Family Office does not currently offer a Wrap Fee Program. In a Wrap Fee Program, clients pay a single fee for advisory, brokerage and custodial services. Portfolio transactions may be executed without commission charge under such an arrangement. Program fees may include the investment advisory fees of the other investment advisers, which may be charged as part of a wrap fee arrangement. In evaluating such an arrangement, investors should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately.

Additional Fees and Expenses

In addition to our advisory fees, clients may be responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which transactions are affected for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Account Requirements

Pre-existing advisory clients may be subject to Seneschal Family Office's minimum account requirements and/or advisory fees in effect at the time they entered into their respective advisory relationships. Therefore, our firm's account requirements may differ among clients.

ERISA Accounts

Seneschal Family Office is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue

Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Seneschal Family Office may only charge fees for:

- investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees; or
- investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees but only when such fees are used to offset Seneschal Family Office's advisory fees.

Seneschal Family Office and its related persons do not receive commissions or 12b-1 fees.

Advisory Fees in General

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Item 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.

Item 7 Types of Clients

Seneschal Family Office provides personal financial planning and investment advice to high-net-worth individuals and families. 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, we generally recommend the following service levels for particular portfolio amounts:

Wealth Management	\$1,000,000 - \$3,000,000
Comprehensive Wealth Management	\$3,000,000 - \$5,000,000
Family Office Services	\$5,000,000 - \$15,000,000+

We generally find it impractical to manage portfolios valued at less than \$500,000 and generally discourage them unless the account is part of a larger family/household relationship. That stated, all minimum requirements are negotiable, and accounts associated with other family or household relationships may be considered as part of total family assets under management. 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 standard fee requirement and accept portfolios under \$500,000 in value. We also waive our standard fee requirement and accept portfolios less than \$500,000 for employees of Seneschal Family Office and their family members.

Item 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 asset allocation analysis, fundamental analysis, and macroeconomic analysis. In doing so we rely on several sources of information, such as general distribution and financial industry publications, research reports prepared by unaffiliated third parties, credit ratings prepared by credit rating firms, and public filings with the SEC.

Asset Allocation Analysis. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of stocks, bonds, and cash suitable to each client and reflective of his/her investment goals and risk tolerance.

A risk of asset allocation is that you may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of stocks, bonds, and cash will change over time due to market movements and, if not corrected, may no longer be appropriate for you.

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it

may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other fund(s) in a client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, or that managers of different funds held by the client may purchase the same security/ies, there could be an

increased risk to the client if that security/ies were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for All Forms of Analysis

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

First and foremost, we believe that investments must be managed within the context of a broad financial planning framework. 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.

We use the following strategies in managing our clients' portfolios, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objective/s, risk tolerance, and time horizon, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them

in the client's portfolio for a year or longer. Typically, we employ this strategy when we want exposure to a particular asset class over time, regardless of the current outlook for that class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Option writing. We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the holder the right to buy an asset at a certain price within a specific period of time. Call buyers purchase call options because they believe that the underlying stock will increase in value before the option expires.
- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. Put buyers purchase put options if they believe the price of the stock will fall before the option expires.

We may use a "covered call" strategy, in which we sell an option on a stock you own to hedge against a market decline or to generate additional income. In this strategy, you receive a fee for giving the call purchaser the right to purchase your stock and the call purchaser has the right to buy the stock from you at an agreed-upon price. The risk in covered call writing is that you may be "called away" – i.e., the call purchaser may exercise his/her right to purchase your stock – when you don't want to sell your stock.

Asset Allocation

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 and exchange traded funds are suitable, cost-effective investment vehicles. Investing in mutual funds and exchange traded 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 and exchange traded funds may help to diversify your portfolio and reduce the risk of loss associated with any one stock or bond, investing in mutual funds and exchange traded funds do 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: Investing 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 sell an investment easily, quickly and cost-effectively 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 and exchange traded funds vary depending upon the investment

mandate of the fund. For each mutual fund or exchange traded 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. Securities investments are not guaranteed and you may lose money on your investments. Investing in any securities, including mutual funds, involves a risk of loss of both income and principal. We ask that you work with us to help us understand your tolerance for risk. 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.

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. Neither Seneschal Family Office nor any of its owners or employees have been named in any

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

Item 10 Other Financial Industry Activities and Affiliations

Seneschal Family Office is an independent financial advisory firm. We and all of our employees, management and owners are unaffiliated with any other firm.

When referring clients to third-party money managers, each money manager

has a separate agreement with Seneschal Family Office, each agreement may have a different fee paid to the manager, which is disclosed to the client in the money manager's paperwork and ADV documents.

No employees, management or owners of Seneschal Family Office 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. We do not recommend or select other investment advisors.

Item 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 the job, and policies designed to deal with conflicts of interest. Seneschal Family Office and our personnel owe a duty of loyalty, fairness and good faith to our clients and have an obligation to adhere to the specific provisions of the Code of Ethics and the general principles underlying it.

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

- Review of quarterly securities transactions
- Review of initial and annual securities holdings reports
- Initial Public Offerings and Private Placements

Our code also provides for oversight, enforcement and recordkeeping provisions. 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 of 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, Tania P. Kaarvand. 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 Family Office and their family members may purchase the same publicly traded, open-end mutual funds or exchange traded 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.

Item 12 Brokerage Practices

The Custodian and Broker We Use

For discretionary clients, Seneschal Advisors, LLC DBA Seneschal Family Office requires clients to provide us with written authority to determine the broker dealer to use to effect securities transactions and the commission costs that will be charged for these transactions. Clients may include any limitations on this discretionary authority and change/amend these limitations at their discretion. Such amendments must be provided to us in writing.

Seneschal Advisors, LLC DBA Seneschal Family Office may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. 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/s with Schwab and enter into an account agreement with them. We do not open the account/s 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 a 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 Family Office. 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

have to produce or purchase them. We don't have to pay for Schwab's services if 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. This may be greater than 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.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not

Item 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 or the market, political or economic environment, indicating that a change in investment strategy is needed.

Portfolios are reviewed by registered Investment Adviser Representatives of the Firm. Currently, the Firm has three registered Investment Adviser Representatives.

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 our firm maintains discretionary authority, 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 may be reviewed with you at your next portfolio review meeting.

If you have added any specific constraints or restrictions to your IPS, we will 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.

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/Consulting Review Process

Financial planning and consulting, when part of an ongoing engagement with us, is a continuous process. Accordingly, we review your progress towards your financial goals with you throughout your engagement, generally at least once per year. The objective of our planning reviews is to make sure your financial plan continues to reflect your current family situation, financial and life goals. Limited Scope Consulting clients who are not engaged in an ongoing consulting arrangement will receive completed deliverables relevant to the scope of the engagement. Additional

reports will not typically be provided unless otherwise contracted for.

Quarterly Portfolio Reports

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

- Portfolio Overview
- Asset Allocation
- Holdings
- Portfolio Value vs. Cumulative Net Investment
- Account Ledger
- Projected Income Report
- Tax Overview
- Billing Statement

Reports are generally distributed in the first two weeks of each calendar quarter.

Item 14 Client Referrals and Other Compensation

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 advisers 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.

It is Seneschal Advisors, LLC DBA Seneschal Family Office’s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

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

Client Referrals

It is Seneschal Advisors, LLC DBA Seneschal Family Office's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

Item 15 Custody

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. The firm endeavors to comply with the SEC no-action letter to the Investment Adviser Association dated February 21, 2017, in this regard.

You will receive account statements directly from Schwab at least quarterly showing all transactions within the account during the reporting period. They will be sent to the postal mailing address or email address associated with your account at Schwab. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review account statements when you receive them to verify the accuracy of the calculation, among other things. We also urge you to compare your Schwab account statements with the quarterly reports that you receive from us to ensure that all account transactions, holdings and values are correct and current. Clients should contact us directly if they believe that there may be an error in their statement.

Certain client accounts subject to our firm's services may be held at a custodian that is not directly accessible by us ("qualified accounts"). We may,

but are not required to, manage these qualified accounts using a held away management platform, which allows us to view and manage these assets. To manage qualified assets, you must agree to the platform's End User Terms and Conditions and Privacy Policy and must further agree to promptly respond to requests to update usernames and password information for qualified accounts. You also must agree to promptly address any requests to update any information when requested by the platform. In the event of any delay by you to your information, you must acknowledge in your agreement that we will not have the ability to effectively manage your assets on this platform, which may result in investment losses. We will not be responsible for any losses arising from your delays in updating information through the held away platform. We will be under no obligation to credit any fees for valuations made in good faith during periods when we did not have access to any qualified account in calculating its fees under the investment management agreement.

Item 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.

Item 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.

As a matter of firm policy, we do not vote proxies on behalf of clients, 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.

For Separately Managed Accounts only, proxy voting will be delegated to the agreed upon sub-adviser or money managers managing the separate account.

If you would like to read our Proxy Voting Policy, please contact us using the contact information provided on the cover page of this brochure.

Item 18 Financial Information

SEC rules require advisers that take custody of client assets provide you with a balance sheet prepared in accordance with generally accepted accounting principles by an independent public accountant. We do not take custody of client assets. Accordingly, we are not required to provide a balance sheet.

Seneschal Advisors, LLC DBA Seneschal Family Office has not been the subject of a bankruptcy petition at any time during the past ten years.

As an advisory firm that maintains discretionary authority for client accounts, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Seneschal Family Office 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 owners/members, Jeffrey M. Lang, Candace E. Duecker, and Tania P. Kaarvand. Their disability or death may temporarily 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 in the cloud.