

(“Firm Brochure”)

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Part 2A of Form ADV (the “Brochure”) provides information about the qualifications and business practices of Coastwise Capital Group, LLC. If you have any questions about the contents of this Brochure, please contact us at (858) 454-6670 or scott@coastwisegroup.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or the California Department of Financial Protection and Innovation.

Coastwise Capital Group, LLC is registered as an investment adviser with the United States Securities and Exchange Commission (“SEC”); however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Coastwise Capital Group, LLC is also available on the SEC’s website at www.adviserinfo.sec.gov.

Effective Date: March 14, 2024

Item 1: Cover Page

See Previous Page.

Item 2: Material Changes

Coastwise Capital Group, LLC is a registered investment adviser with the United States Securities and Exchange Commission (“SEC”). Our prospective Clients are strongly encouraged to read this brochure in its entirety prior to engaging Coast Capital Group, LLC for any advisory services.

The previous version of this Brochure was dated March 23, 2023. Below is a summary of the material changes made to Coastwise Capital Group, LLC’s Brochure and Brochure Supplement since the Brochure was last updated:

- Item 4 -Advisory Business - updated to reflect the following:
 - Current Assets under Management as of December 31, 2023.

Pursuant to the SEC regulation, Coastwise Capital Group, LLC will ensure that Clients receive a summary of any materials changes to this Brochure within 120 days of the close of Coastwise Capital Group, LLC’s fiscal year-end. Additionally, as the Firm experiences material changes in the future, we will send you a summary of our “Material Changes” under separate cover. For more information about the firm, please contact us at (858) 454-6670 or scott@coastwisegroup.com.

Additional information about Coastwise Capital Group, LLC and its investment adviser representatives is also available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 4: Advisory Business

Firm Description

Coastwise Capital Group, LLC, hereinafter (“the Adviser”) was founded in 2006 and is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”).

The Adviser provides investment advisory services to its clients through separately managed accounts. The advisory services include, among other things, providing portfolio management and financial advice regarding asset allocation and the selection of investments. Account management or supervision is guided by the stated objectives of the client. In addition, the Adviser considers the client’s risk profile and financial status prior to making any recommendations and as a fiduciary places the client’s financial interest ahead of its own.

- When the Adviser provides investment advice regarding retirement plan accounts or individual retirement accounts, the Adviser, they 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. The way the Adviser makes money creates some conflicts with the interests of our clients, so they operate under a special rule that requires them to act in the client’s best interest. Under this special rule’s provisions, the Adviser must also meet a professional standard of care when making investment recommendations (give prudent advice); never put our financial interests ahead of yours when making recommendations (give loyal advice); avoid misleading statements about conflicts of interest, fees, and investments; follow policies and procedures designed to ensure that we give advice that is in your best interest; charge no more than is reasonable for our services; and give you basic information about conflicts of interest.

The Adviser does not act as a custodian of client assets and the client always maintains asset control. The Adviser has discretion of client accounts and places trades for clients under a limited power of attorney.

The Adviser also provides Financial Consulting services on securities and investment advice. The advisor also provides Financial Planning advice on topics that may include tax, budgetary, estate, and business planning analysis.

Firm Owners

Scott G. Kyle is the Managing Member, Chief Compliance Officer, and principal owner of the Adviser.

Patrick Fischer is a partial owner of the Advisor.

Types of Advisory Services:

Asset and Portfolio Management Services to Separate Accounts

The advisory services include, among other things, portfolio management, and providing advice regarding asset allocation and the selection of investments for client separate accounts. As part of the investment management service, all aspects of the client's financial affairs are reviewed, and realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. The Adviser periodically reviews a client's financial situation and portfolio through regular contact with the client.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. The agreement sets forth the services to be provided, the fees for the service and the terms of termination.

An advisory client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the investment advisory agreement with 30 days written notice. Upon termination, fees will be prorated to the date of termination.

As of December 31, 2023, the Adviser had approximately \$164,172,686.14 in assets under management.

Through its investment management services, the Adviser may utilize various investments including investments in equities (stocks) - which may be exchange listed securities, over-the-counter securities or foreign equities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts and futures contracts, and private placements in Limited Partnerships.

When assets are invested in no-load or low-load mutual funds and exchange-traded funds, it is usually through brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Brokerages may charge a transaction fee for the purchase of some funds. The Adviser does not receive any compensation, in any form, from fund companies.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades.

The Adviser may also offer investment advice regarding private placements in Limited Partnerships.

Financial Consulting and Financial Planning Services

The Adviser provides financial consulting services. The Adviser may also provide financial planning services on non-securities advice on topics that may include tax and budgetary planning, estate planning, business planning and business analysis.

Financial consulting and/or financial planning may be the only services provided to the client and do not require that the client use the investment advisory services offered by the Adviser. There is an inherent conflict of interest for the Adviser whenever a financial consultation and/or financial

planning recommends use of professional investment management services or the purchase of products or securities in which the Adviser has a direct or indirect financial interest. The conflict of interest exists between the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and if the client elects to act upon any recommendations, the client is under no obligation to affect the transaction through the investment adviser.

A consulting and/or planning client will have a period of five (5) business days from the date of signing the agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the agreement by providing the Adviser with written notice prior to completion of the service. The Adviser considers fees for a consulting and/or planning project to be earned as progress is realized toward completion of the service. Under no circumstances will the Adviser earn fees in excess of \$500 more than six months in advance of services rendered. Clients may be due a refund upon early termination of a Financial Consulting Agreement and/or a Financial Planning Agreement and the Adviser's fees may be prorated to the date of termination.

Wrap Fee Programs

Coastwise Capital Group, LLC does not participate in any wrap fee programs as of this date.

Assignment of Investment Management Agreements

Investment Advisory and Financial Consulting Agreements may not be amended, transferred, or assigned without the prior written consent of the other party.

Other

The firm may release books or periodic newsletters and provide them to its clients or interested parties without a fee. Individuals are not required to receive or read this information and can opt out at any time.

The CEO may enter into speaking arrangements or seminars. They are not a requirement for clients or individuals.

Item 5: Fees and Compensation

Asset and Portfolio Management Services to Separate Accounts

The Adviser bases its fees on a percentage of assets under management. Fees are negotiable and may be a flat fee rate or a tiered fee rate. A flat fee rate would charge a single fee for all assets in the client(s) household portfolios; whereas a tiered fee rate would charge a different fee for assets at each level (*see table*). The negotiated fee may be more or less than the ranges reflected in the fee schedule. The specific negotiated fee will be stated on the Investment Advisory Agreement.

Asset Under Management	Annualized Fee
First \$500,000	1.50%
Next \$1,000,000	1.25%
Next \$1,500,000	1.00%
\$3,000,000	Negotiable

Fees on the majority of portfolios managed by the Adviser are paid monthly in arrears, are due on the first day of the next calendar month and are based on the account's asset value as of the last day of the prior calendar month. In very few cases, fees are paid quarterly in advance, due on the first day of the quarter based on the account's asset value as of the last day of the prior quarter. Fees are prorated for accounts opened during the month as well as inter-month capital flows. In addition, management fees may be adjusted and prorated during a billable month based upon the listed breakpoints described above. The Adviser generally deducts fees directly from client accounts; however, clients do have the option to be invoiced monthly. Invoiced clients are invoiced on the first business day of the calendar month.

Lower fees for comparable services may be available from other sources at other advisors.

Financial Consulting

Clients are charged an hourly fee or a package rate fee for consulting services. Fees are based on the complexity of the project and the range of services provided. Clients who select consulting services are billed at the maximum rate of \$250 an hour for Chief Investment Officer services. Clients will be invoiced on a monthly basis. Monies owed are payable upon receipt of invoice.

Fees for Laurie Itkin's consulting services are billed at a rate ranging from \$200 to \$300 per hour or based on a pre-determined package rate which ranges from \$200 to \$499 depending on the time and level of complexity. These fees are paid in advance and all services will be promptly completed, not to exceed 180 days.

The Adviser considers fees for a consulting project(s) to be earned as progress is realized toward completion of the service. Under no circumstances will the Adviser earn fees in excess of \$500 more than six months in advance of services rendered.

In the event of unearned fees upon early termination of a Financial Consulting Agreement, the client will be due a refund. Also, the Adviser's fees may be prorated to the date of termination where applicable.

Lower fees for comparable services may be available from other sources.

Financial Planning

Clients are charged a package rate fee for planning services. Fees are based on the complexity of the project and the range of services provided. Clients who select planning services are billed at the minimum rate of \$750 per project. These fees are paid in advance and all services will be promptly completed, not to exceed 180 days. Monies owed are payable upon receipt of invoice.

The Adviser considers fees for planning project(s) to be earned as progress toward completion of the service. Under no circumstances will the Adviser earn fees in excess of \$500 more than six months in advance of services rendered.

In the event of unearned fees upon early termination of a Financial Planning Agreement, the client will be due a refund. Also, the Adviser's fees may be prorated to the date of termination where applicable.

Lower fees for comparable services may be available from other sources.

Other Compensation

The Adviser does not receive any compensation from the purchase or sale of any securities.

The Adviser currently does not receive compensation from any hedge funds or for acting in a sub-advisory role. If the firm would enter into such an agreement, the compensation would be in the form of a percentage of management fees and/or performance fees, collected by the partner firm's clients.

Other Fees

The client will likely incur fees from brokerages, custodians, administrators, and other service providers. These fees are incurred as a result of managing a client account and are charged by the service provider. The amount and nature of these fees is based on the service provider's fee schedule(s) at the provider's sole discretion. These fees are separate and distinct from any fees charged by the Adviser.

The Adviser may include mutual funds, variable annuity products, ETFs, and other managed products or partnerships in clients' portfolios. Clients may be charged for the services by the providers/managers of these products in addition to the management fee paid to the Adviser. The fees and expenses are described in each mutual fund's or underlying annuity fund's prospectus or in the offering memorandums of a partnership. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. No-load or load waived mutual funds may be used in client portfolios so there would be no initial or deferred sales charges; however, if a fund that imposes sales charges is selected, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund or variable annuity or investment partnership directly, without the services of the Adviser. Accordingly, the client should review both the fees charged by the funds and the applicable program fee charged by the Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. If it is determined that a client portfolio shall contain corporate debt or other types of over-the-counter securities, the client may pay a mark-up or mark-down or a "spread" to the broker or dealer on the other side of the transaction that is built into the purchase price of the security. The CEO may enter into speaking arrangements and the cost of such is complimentary.

Item 6: Performance Based Fees and Side by Side Management

Certain client accounts may be subject to an annual performance fee of up to 20% so they must be “qualified clients” under federal securities laws. The fee is assessed at the end of each quarter or year if there has been a net asset increase that is above any net asset decrease in the account’s value. All clients that will be charged a performance fee must have at least \$1,100,000 invested with the Adviser or have a net worth of more than \$2,200,000 at the time of entering into an agreement. Any performance-based fees will be charged in accordance with the provisions of SEC Rule 305-3.

Conflict of Interest Between Different Fee Structures

The Adviser offers several different services detailed in this brochure that compensate the Adviser differently depending on the service selected. There is a conflict of interest for the Adviser and its associated personnel to recommend the services and/or favor accounts that offer a higher level of compensation to the Firm through either higher management fees, performance fees, or reduced administrative expenses. The Adviser mitigates this conflict through its procedures to review client accounts relative to the client or investor’s personal financial situation to ensure the investment management service provided is appropriate. Further, the Adviser is committed to its obligation to ensure associated persons adhere to the Firm’s Code of Ethics and to ensure that the Firm and its associated persons fulfill their fiduciary duty to clients or investors.

Item 7: Types of Clients

Description

The Adviser generally provides investment advice to individuals, corporations or business entities, and trusts. Additionally, the Adviser may provide investment advice to banks or thrift institutions, estates, investment companies or charitable organizations. Client relationships vary in scope and length of service.

Account Minimums

The Adviser does not impose a minimum dollar value of assets for starting or maintaining an account with the Adviser.

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

Methods of Analysis

Security analysis methods may include fundamental analysis and technical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

Strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

The Adviser provides investment advisory services to its clients on a discretionary basis. The advisory

services include, among other things, providing advice regarding asset allocation and the selection of investments. Account management or supervision is guided by the stated objectives of the client. In addition, the Adviser considers the client's risk profile and financial status prior to making any recommendations.

Market, Security and Regulatory Risks

Any investment with the Adviser involves significant risk, including a complete loss of capital and conflicts of interest. All investment programs have certain risks that are borne by the investor which are described below:

Market Risks:

Competition. The securities industry and the varied strategies and techniques to be engaged in by the Adviser are extremely competitive and each involves a degree of risk. The Adviser will compete with firms, including many of the larger securities and investment banking firms, which have substantially greater financial resources and research staff.

Market Volatility. The profitability of the Adviser substantially depends upon its correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Adviser cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

Coastwise Capital Group LLC's Investment Activities. The Adviser's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the Adviser. Such factors include a wide range of economic, political, competitive, technological, and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability of the Adviser to realize profits.

Material Non-Public Information. By reason of their responsibilities in connection with other activities of the Adviser and/or its affiliates, certain principals, or employees of the Adviser and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Accuracy of Public Information. The Adviser selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Adviser by the issuers or through sources other than the issuers.

Although the Adviser evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Adviser is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Investments in Undervalued Securities. The Adviser intends to invest in undervalued securities. The identification of investment opportunities in undervalued securities is a difficult task, and there are no assurances that such opportunities will be successfully recognized or acquired. While investments in undervalued securities offer opportunities for above-average capital appreciation,

these investments involve a high degree of financial risk and can result in substantial losses. Returns generated from the Adviser's investments may not adequately compensate for the business and financial risks assumed.

Small Companies. The Adviser may invest a portion of its assets in small and/or unseasoned companies with small market capitalization. While smaller companies generally have potential for rapid growth, they often involve higher risks because they may lack the management experience, financial resources, product diversification, and competitive strength of larger companies. In addition, in many instances, the frequency and volume of their trading may be substantially less than is typical of larger companies. As a result, the securities of smaller companies may be subject to wider price fluctuations.

Leverage. When deemed appropriate by the Adviser and subject to applicable regulations, the Adviser may incur leverage in its investment program, whether directly through the use of borrowed funds, or indirectly through investment in certain types of financial instruments with inherent leverage, such as puts, calls and warrants, which may be purchased for a fraction of the price of the underlying securities while giving the purchaser the full benefit of movement in the market of those underlying securities. While such strategies and techniques increase the opportunity to achieve higher returns on the amounts invested, they also increase the risk of loss.

Options and Other Derivative Instruments. The Adviser may invest, from time to time, in options and other derivative instruments, including, but not limited to, the buying and selling of puts and calls. The prices of many derivative instruments, including many options and swaps, are highly volatile. The values of options and swap agreements depend primarily upon the price of the securities, indexes, commodities, currencies or other instruments underlying them. Price movements of options contracts and payments pursuant to swap agreements are also influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Options on highly volatile securities, currencies or other assets may be more expensive than options on other investments.

Hedging Transactions. Investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, other derivatives, and other investment techniques can be utilized by the adviser to hedge against fluctuations in the relative values of its portfolio positions as a result of changes in currency exchange rates, interest rates and/or the equity markets or sectors thereof. Any hedging against a decline in the value of portfolio positions does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. The Adviser is not obligated to establish hedges for portfolio positions and may not do so.

Market or Interest Rate Risk. The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the Adviser holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Adviser's performance; however, if the Adviser needs to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the Adviser.

Fixed Income Call Option Risk. Many bonds, including agency, corporate and municipal bonds, and all mortgage-backed securities, contain a provision that allows the issuer to “call” all or part of the issue before the bond’s maturity date. The issuer usually retains this right to refinance the bond in the future if market interest rates decline below the coupon rate. There are three disadvantages to the call provision. First, the cash flow pattern of a callable bond is not known with certainty. Second, because the issuer will call the bonds when interest rates have dropped, the Adviser is exposed to reinvestment rate risk – the Adviser will have to reinvest the proceeds received when the bond is called at lower interest rates. Finally, the capital appreciation potential of a bond will be reduced because the price of a callable bond may not rise much above the price at which the issuer may call the bond.

Inflation Risk. Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Adviser purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the Adviser is exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security.

Investments in Non-U.S. Investments. From time to time, the Adviser may invest and trade a portion of its assets in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social, and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- Enforcing legal rights in some foreign countries is difficult, costly, and slow, and there are sometimes special problems enforcing claims against foreign governments.
- Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Adviser may directly hold foreign currencies and purchase and sell foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the Adviser’s net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the Adviser’s investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the Adviser’s foreign currency holdings. If the Adviser enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the Adviser enters forward contracts for the purpose of increasing return, it may sustain losses.
- Non-U.S. securities, commodities and other markets may be less liquid, more volatile, and less closely supervised by the government than in the United States. Foreign countries often

lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

Risk of Default or Bankruptcy of Third Parties. The Adviser may engage in transactions in securities, commodities, other financial instruments, and other assets that involve counterparties. Under certain conditions, the Adviser could suffer losses if a counterparty to a transaction were to default or if the market for certain securities, commodities, other financial instruments, and/or other assets were to become illiquid.

Regulatory Risks:

Strategy Restrictions. Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Adviser may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel, and accountants to determine what restrictions may apply and whether an investment in the Adviser is appropriate.

Trading Limitations. For all securities, instruments, and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the Adviser to loss. Also, such a suspension could render it impossible for the Adviser to liquidate positions and thereby expose the Adviser to potential losses.

Conflicts of Interest: In the administration of client accounts, portfolios and financial reporting, the Adviser faces inherent conflicts of interest which are described in this brochure. Generally, the Adviser mitigates these conflicts through its Code of Ethics which provides that the client's interest is always held above that of the Firm and its associated persons.

Supervision of Trading Operations. The Adviser, with assistance from its brokerage and clearing firms, intends to supervise and monitor trading activity in the portfolio accounts to ensure compliance with firm and client objectives. Despite the Adviser's efforts, however, there is a risk that unauthorized or otherwise inappropriate trading activity may occur in portfolio accounts.

Depending on the nature of the investment management service selected by a client and the securities used to implement the investment strategy, clients will be exposed to risks that are specific to the securities in their particular investment portfolio.

Security Specific Risks:

Liquidity: Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

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

Limited Liquidity of Interests. An investment in a partnership usually involves substantial restrictions on liquidity and its interests are not freely transferable. There is no market for these interests and no market should be expected to develop. Additionally, transfers are usually subject to the consent of the general partner at the general partner's sole discretion.

Lack of Registration: Funds or LP interests have neither been registered under the Securities Act nor under the securities or “blue sky” laws of any state and, therefore, are subject to transfer restrictions.

Withdrawal of Capital: The ability to withdraw funds from the funds or LP interests is usually restricted in accordance with the withdrawal provisions contained in an Offering Memorandum. In addition, substantial withdrawals by investors within a short period of time could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, possibly reducing the value of the fund’s assets, and/or disrupting the fund’s investment strategy.

Item 9: Disciplinary Information

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

The Adviser has no material affiliations with other financial or non-financial entities.

Other Business Activities

The Adviser currently has no arrangements that are material to its advisory or its clients with another investment advisor or any other firms. If the Adviser were to enter into such an agreement, The Adviser would be committed to its obligation to ensure associated persons adhere to the Firm’s Code of Ethics and to ensure that the Firm and its associated persons fulfill their fiduciary duty to clients or investors.

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

Code of Ethics

The Adviser has adopted a Code of Ethics, pursuant to SEC rule 204A-1, for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Adviser and its personnel have a duty of loyalty, fairness, and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.

The Code covers a range of topics that may include general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings, private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, and amendments to Form ADV and supervisory procedures. The Adviser will provide a copy of the Code to any client or prospective client upon request.

Participation or Interest in Client Transactions

Under the Adviser's Code of Ethics, the Adviser and its managers, members, officers, and employees may personally invest in the same or related securities that the Adviser recommends or purchases for clients. Additionally, the Adviser and its managers, members, officers, and employees may buy or sell securities for their own accounts at or about the same time that the Adviser also recommends or purchases these same securities for clients. The Adviser may also recommend to client's securities or private placements in Limited Partnerships. The Adviser and its managers, members, officers, and employee may also buy or sell or invest in specific securities for their own accounts based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients. The Adviser mitigates these conflicts through its procedures to review client accounts relative to the client or investor's personal financial situation to ensure the investment management service provided is appropriate. The Adviser is committed to its obligation to ensure associated persons adhere to the Firm's Code of Ethics and to ensure that the Firm and its associated persons fulfill their fiduciary duty to clients or investors. All personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility. Additionally, all access persons of the Adviser shall seek prior written approval from Scott Kyle before acquiring any beneficial ownership in any securities in an Initial Public Offering for his or her account and/or before acquiring beneficial ownership of any securities in a limited offering or private placement.

Personal Trading

The Chief Operating Officer of the Adviser is Brad Saenz. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment.

Item 12: Brokerage Practices

Brokerage Selection and Soft Dollars

The Adviser may select the broker-dealers for trade execution at its discretion, however, from time to time; the Adviser may allow clients to direct brokerage to broker-dealer of their choosing. In selecting brokers or dealers to execute transactions, the Adviser will seek to achieve the best execution possible, but this does not require it to solicit competitive bids and does not have an obligation to seek the lowest available commission cost.

In the event the Adviser enters any soft dollar arrangements, the Adviser is not required to negotiate "execution only" commission rates, thus the client may be deemed to be paying for research and related services (i.e., "soft dollars") provided by the broker which are included in the commission rate. Research and related services furnished by brokers may include, but are not limited to, written information and analyses concerning specific securities, companies, or sectors; market, financial and economic studies and forecasts; financial publications; statistical and pricing services, as well as discussions with research personnel, along with hardware, software, data bases and other technical and telecommunication services and equipment utilized in the investment management process. It is the policy and practice of the Adviser to strive for the best price and execution for costs and discounts which are competitive in relation to the value of the transaction,

and which comply with Section 28(e) of the Securities Exchange Act of 1934, as amended. Nevertheless, it is understood that the Adviser may pay compensation on a transaction in excess of the amount of compensation that another broker or dealer may charge so long as it is in compliance with Section 28(e), and the Adviser makes no warranty or representation regarding compensation paid on transactions. In negotiating mark-ups or mark-downs, the Adviser will take into account the financial stability and reputation of brokerage firms and the brokerage and research services provided by such brokers, although the client may not, in any particular instance, be the sole direct or indirect beneficiary of the research services provided. The Adviser has no obligation to deal with any broker or group of brokers in executing transactions in portfolio securities.

The Adviser believes the foregoing services benefit its clients, but they do not benefit clients exclusively. These benefits are also available to the Adviser in connection with transactions in which some or all of its clients may not participate.

It is likely that the Adviser from time to time will affect securities transactions and pay a commission that exceeds the commission another broker-dealer would have charged. Generally, the Adviser will determine in good faith that such commission is reasonable in relation to the value of the brokerage services provided by such broker-dealer, viewed in terms of either that particular transaction or the overall relationship.

The Adviser may recommend or require that clients establish brokerage accounts with the Schwab Advisor Services (formerly called 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. Although the Adviser may recommend or require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. The Adviser is independently owned and operated and not affiliated with Schwab.

Schwab provides the Adviser with access to its institutional trading at custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them as long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon the Adviser committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For the Adviser client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to the Adviser other products and services that benefit the Adviser but may not directly benefit its client's accounts. Many of these products and services may be used to service all or some substantial number of the Adviser's accounts, including accounts not maintained at Schwab.

Schwab Institutional also offers other services intended to help the Adviser manage and further develop its business enterprise. These services may include: (i) compliance, legal, and business consulting; (ii) publications and conferences on practice management and business succession; and

(iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange, and/or pay third-party vendors for these types of services rendered to the Adviser. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services to pay all or a part of the fees of a third-party providing these services to the Adviser. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of the Adviser personnel. In evaluating whether to recommend or require that client's custody their assets at Schwab, the Adviser may take into account the availability of some of the foregoing productions and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Order Aggregation

The firm does not engage in order aggregation. The nature of the clients and/or trading activity on behalf of client accounts and Funds are such that trade aggregation does not garner any client benefit.

Directed Brokerage

The Adviser may allow clients to direct brokerage, but the Adviser does not require clients to direct brokerage. In the event that a client directs the Adviser to use a particular broker or dealer, the Adviser may not be authorized under those circumstances to negotiate commissions and may not be able to obtain best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct the Adviser to use a particular broker or dealer and other clients who do not direct Adviser to use a particular broker or dealer which may result in higher trading expenses to the client who directs brokerage. The Adviser may place orders for transactions in certain securities initially only for those accounts which are held in custody at banks or at brokerage firms that permit the Adviser to place trades for accounts held in custody at that firm with other brokerage firms. Therefore, accounts held in custody at firms which do not permit the Adviser to place transactions with other brokerage firms may not be able to participate in the initial transaction and may not be able to participate in the same gains or losses as other Clients whose accounts are not so restricted. In cases where trading or investment restrictions are placed on a Client's account, the Adviser may be precluded from aggregating that Client's transaction with other accounts which may result in less favorable security prices and/or higher transaction costs.

Item 13: Review of Accounts

Periodic Reviews

One or more of the Financial Advisors perform reviews of all investment advisory accounts no less than quarterly. Accounts are reviewed for consistency with the investment strategy and performance. The reviews occur at least quarterly, but most occur monthly. Transactions including cash movements are reviewed daily. The reviews are performed by the Financial Advisors (performed by the CEO/CIO or a Financial Advisor/portfolio manager), who handle the specific accounts with periodic second reviews by another Financial Advisor or by the CEO/CIO.

Review Triggers

Accounts are reviewed quarterly or more frequently when market conditions dictate. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's financial or personal situation.

Regular Reports

Clients receive statements of account positions no less than quarterly from the account custodian. Additional reports may be prepared at the request of the client.

Item 14: Client Referrals and Other Compensation

Incoming Client Referrals

From time to time, the Adviser may enter into agreements which comply with Rule 206(4)-3 and other requirements of the Investment Advisors Act providing for cash compensation to registered solicitors and/or Investment Adviser Representatives who secure clients for the Adviser. When applicable the endorser will be licensed as investment advisers or notice filed in the applicable jurisdiction.

Each solicitor will provide all prospective clients with a copy of the Adviser's Brochure, and a separate written disclosure document (if applicable) which fully informs the client regarding the nature of the relationship between the Solicitor and the Adviser and any Referral Fees to be paid thereunder. The Adviser will obtain confirmation that solicited clients received the Adviser's Brochure and the separate written disclosure document from the solicitor prior to entering into an advisory relationship with any such client.

In exchange for each referral, the Adviser passes through to the Solicitor a percentage of all investment advisor fees received by the Adviser payable for a certain term or until the relationship of the client is canceled with the Adviser before the term has ended, unless a different arrangement

is agreed to in writing by the Solicitor and Adviser. The exact fee to be paid to a particular solicitor will be determined by the Agreement between the Adviser and the Solicitor.

Investment Advisors of Coastwise Capital also receive a tiered percentage for referred clients to the firm ranging from 30% to 80% of the fees collected, as dictated by whether they act as the advisor for the accounts or not. Referral fees are paid by Coastwise Capital and do not incur an extra cost to the client.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Referrals to Third Parties

The Adviser does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Custody Policy

The Adviser does not accept or permit the Firm or its associated persons from obtaining custody of client assets including cash, securities, acting as trustee, provide bill paying service, have password access to control account activity or any other form of controlling client assets. All checks or wire transfer to fund client accounts are required to be made out to/sent to the account custodian.

Account Statements

Account statements are generated no less than quarterly. These statements are sent directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived. Advisers also urge clients to review the statements received directly from the custodian to ensure accuracy of all account transactions.

Item 16: Investment Discretion

The Adviser contracts for limited discretionary authority to transact portfolio securities accounts on

behalf of clients. Discretionary authority is granted either by the Adviser's investment management agreement and/or by a separate limited power of attorney where such document is required. The Adviser has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The firm's discretionary authority regarding investments may however be subject to certain limitations. These limitations are recognized as the restrictions and prohibitions placed by the Client on transactions in certain types of business or industries. All such restrictions are to be agreed upon in writing at the account's inception.

The Adviser will consult with the client where discretion is not obtained prior to each trade in order to obtain client approval for the transaction(s).

The client authorizes the discretion to select the custodian to be used and the commission rates paid by the Adviser. The Adviser does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Item 17: Voting Client Securities

The Adviser will not vote nor advise clients how to vote proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. The Adviser does not give any advice or take any action with respect to the voting of these proxies. For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. The Adviser promptly passes along any proxy voting information to the clients or their representatives. From time to time, the client may request guidance from the Adviser or clarification regarding proxy voting material. The Adviser may choose to give advice to the client; however, the Adviser is not required to do so.

Item 18: Financial Information

The Adviser does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. The Adviser meets all net capital requirements that it is subject to and the Adviser has not been the subject of a bankruptcy petition in the last 10 years.

The Adviser is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

ADV Part 2B – BROCHURE SUPPLEMENT FOR SUPERVISED PERSONS

Item 1: Cover Page

Scott G. Kyle

Coastwise Capital Group, LLC

7777 Fay Avenue, Suite G5

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This brochure supplement provides information about Scott G. Kyle that supplements the Coastwise Capital Group, LLC brochure. You should have received a copy of that brochure. Please contact Scott Kyle (CEO/Chief Investment Officer) if you did not receive the Coastwise Capital Group, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Scott G. Kyle is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Educational Background: Scott G. Kyle holds Bachelor's degrees in Economics and International Relations from Tufts University (Sept. 1984-June 1989), a General Course Degree in International Relations from the London School of Economics (Sept. 1986- June1987) and a MBA from Harvard University (Sept.1991-June1993).

Date of birth: 1966

Business Experience: Mr. Kyle He has over 20 years of money management experience. He is the Managing Member, Chief Executive Offer, and Chief Investment Officer of the Adviser since its formation in January 2006. Previously he was the Managing Director of G2 Capital Management, LLC (Sept. 2002-Dec. 2005).

Mr. Kyle has negotiated, performed due diligence, and consummated the purchase of equity stakes in over twelve (12) privately held businesses. As a co-founder and principal source of early-stage investment funding for The Active Network, Inc., a technology and marketing solutions company for the participatory sports and recreation industry, Mr. Kyle served as CFO since its inception in January of 1998 through 2002.

During his tenure, Mr. Kyle was directly involved in raising over fifty-four million dollars (\$54,000,000) of financial and strategic capital from venture capital firms and publicly traded companies including Canaan Partners, Austin Ventures, Enterprise Partners, Deutsche Bank/Alex Brown and TicketMaster (formerly TMCS, now IACI).

In addition, he managed the successful acquisition and integration of seven companies: ActiveUSA, Inc., LeagueLink, Inc., EnterOnline, GetSetGo, Inc., eTeamz.com, Inc., Sierra Digital, Inc., and MyTeam.com, Inc. Prior to co-founding Active, Mr. Kyle was the CEO and Publishing Director for Triathlon Group North America, LLC (TGNA), and the parent company of Triathlete Magazine. During his tenure, Mr. Kyle was responsible for managing the turnaround of the twenty (20) year old publication to then record growth and profitability.

From 1993 - 1997, Mr. Kyle was the Publisher at Dearborn Trade and the Director of Dearborn's International Division. As Publisher of the Trade Division, Mr. Kyle was responsible for managing a group of over sixty (60) people and a budget in excess of five million dollars (\$5,000,000) in sales. Mr. Kyle served on the parent company's Board of Directors from 1996 until the company was sold to the publicly traded Washington Post Company for over thirty-six million dollars (\$36,000,000) in 1998.

Item 3: Disciplinary Information

Scott Kyle (the "supervised person") has not been involved with any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person.

Item 4: Other Business Activities:

Mr. Kyle (the "supervised person") is not actively engaged in any investment-related business or occupation, including being registered, or having an application pending to

register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), or commodity trading advisor ("CTA"), nor is the supervised person an associated person of an FCM, CPO, or CTA.

Mr. Kyle (the "supervised person") is not actively engaged in any business or occupation for compensation not discussed in response to Item 4. (A), above, that provides a substantial source of the supervised person's income or involves a substantial amount of the supervised person's time.

Item 5: Additional Compensation

Scott Kyle does not receive, from any non-Client, any economic benefit associated with advising Clients (such as sales awards and prizes, any bonus that is based on number or amount of sales, client referrals or new accounts, not including salary).

Item 6: Supervision

Scott Kyle is self-supervised.

Item 7: Requirements for State-Registered Advisers:

(A) In addition to the events listed in Item 3 above, if the supervised person has been involved in one of the events listed below, disclose all material facts regarding the event:

- (i) An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or e. dishonest, unfair, or unethical practices.

Answer: None

- (ii) An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or e. dishonest, unfair, or unethical practices.

Answer: None

(B) If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status. **Answer: None**

Item 1: Cover Page

Laurie Itkin

Coastwise Capital Group, LLC

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This brochure supplement provides information about Laurie Itkin that supplements the Coastwise Capital Group, LLC brochure. You should have received a copy of that brochure. Please contact Scott Kyle (CEO/Chief Investment Officer) if you did not receive the Coastwise Capital Group, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Laurie Itkin is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Educational Background: Laurie Itkin holds a Bachelor of Science Degree in Economics with a concentration in finance from the Wharton School of the University of Pennsylvania (Sept. 1986-May 1990).

Date of birth: 1968

Business Experience: Ms. Itkin's financial industry experience includes serving as an options trading assistant for O'Connor and Associates (June 1989 to August 1989); a financial analyst for Furash & Company (1990); and an associate for KPMG's Financial Institutions Washington Advisory Service (1991) where she analyzed proposed regulations promulgated by federal financial regulatory agencies.

For the majority of her career, Ms. Itkin worked in federal and state regulatory and legislative affairs. She served as a policy specialist for a trade association on Capitol Hill (1992-1996), a policy advisor to Oregon's governor (1996-1998), and a lobbyist for three publicly traded corporations (1998-2011).

In January 2012, Ms. Itkin founded Rouge Government and Public Affairs,

In 2012 Ms. Itkin launched The Options Lady to educate and mentor retail investors on how to trade stocks and options in self-directed accounts. She has been an Investment Advisor Representative with Coastwise Capital Group since January 2013.

In January 2016, she received the Certified Divorce Financial Analyst (CDFA) designation.

Item 3: Disciplinary Information

Laurie Itkin (the "supervised person") has not been involved with any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person.

Item 4: Other Business Activities:

Laurie Itkin (the "supervised person") is actively engaged in an investment-related business or occupation, as she provides education on trading options and other non-specific investment related topics through her business, The Options Lady. She also provides divorce-related financial analysis to lawyers, mediators, and divorcing parties in her capacity as a Certified Divorce Financial Analyst (CDFA) through her business. In this line of business, it is not necessary for her to be registered, or have an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), or commodity trading advisor ("CTA"), nor is the supervised person an associated person of an FCM, CPO, or CTA.

Laurie Itkin (the "supervised person") is not actively engaged in any business or occupation for compensation not discussed in response to Item 4. (A), above, that provides a substantial source of the supervised person's income or involves a substantial amount of the supervised person's time.

Item 5: Additional Compensation: Laurie Itkin (the “supervised person”) does not receive, from any non-Client, any economic benefit associated with advising Clients (such as sales awards and prizes, any bonus that is based on number or amount of sales, client referrals or new accounts, not including salary).

Ms. Itkin receives royalties from sales of her book, Every Woman Should Know Her Options: Invest Your Way to Financial Empowerment and her online courses. Ms. Itkin also receives \$300/hour as a direct consultant through her divorce financial consulting business, The Options Lady. Flat-fee packages are also available. She also receives speaking fees of \$0 to \$750 for presentations. Ms. Itkin does provide pro-bono financial planning through Savvy Ladies’ Helpline, a non-profit corporation.

Item 6: Supervision Ms. Itkin is supervised by Scott G. Kyle, Chief Executive Officer. He reviews Ms. Itkin’s work through frequent interactions.

Scott G. Kyle’s contact information: PHONE: 858.454.6670
EMAIL: scott@coastwisegroup.com

Item 7: Requirements for State-Registered Advisers:

- (A) In addition to the events listed in Item 3 above, if the supervised person has been involved in one of the events listed below, disclose all material facts regarding the event:
- (i) An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
- a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or e. dishonest, unfair, or unethical practices.

Answer: None

- (ii) An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
- a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or e. dishonest, unfair, or unethical practices.

Answer: None

- (B) If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Answer: None

Item 1: Cover Page

Patrick Fischer

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This brochure supplement provides information about Patrick Fischer that supplements the Coastwise Capital Group, LLC brochure. You should have received a copy of that brochure. Please contact Scott Kyle (CEO/Chief Investment Officer) if you did not receive the Coastwise Capital Group, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Patrick Fischer is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Educational Background: Mr. Fischer holds a BA in mathematics and a BS in computer science engineering from UC San Diego as well as an MBA with a concentration in finance from UC Berkeley.

Date of birth: 1978

Business Experience: Mr. Fischer began his career with Mr. Kyle at G2 Capital Management (the predecessor to Coastwise Capital Group) in La Jolla in 2002 as an equity research associate. From 2004 to 2008, Mr. Fischer co-managed a systematic global macro hedge fund at Mellon Capital Management in San Francisco. After graduating from business school, Mr. Fischer spent the following decade overseas in Singapore and London in commodities trading and business development roles at Nomura, Citi, and Trafigura. Mr. Fischer is currently pursuing a CFP designation.

Item 3: Disciplinary Information

Patrick Fischer (the “supervised person”) has not been involved with any legal or disciplinary events material to a client’s or prospective client’s evaluation of the supervised person.

Item 4: Other Business Activities:

Mr. Fischer (the “supervised person”) is not actively engaged in any investment-related business or occupation, including being registered, or having an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), or commodity trading advisor (“CTA”), nor is the supervised person an associated person of an FCM, CPO, or CTA.

Patrick Fischer (the “supervised person”) periodically engages in non-investment related work for technology companies.

Item 5: Additional Compensation: Patrick Fischer (the “supervised person”) does not receive, from any non-Client, any economic benefit associated with advising Clients (such as sales awards and prizes, any bonus that is based on number or amount of sales, client referrals or new accounts, not including salary).

Item 6: Supervision Mr. Fischer is supervised by Scott G. Kyle, Chief Executive Officer. He reviews Mr. Fischer’s work through frequent interactions.

Scott G. Kyle’s contact information: PHONE: 858.454.6670
EMAIL: scott@coastwisegroup.com

Item 7: Requirements for State-Registered Advisers:

(A) In addition to the events listed in Item 3 above, if the supervised person has been involved in one of the events listed below, disclose all material facts regarding the event:

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

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

Answer: None

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

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

Answer: None

(B) If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Answer: None

Item 1: Cover Page

Brad Saenz

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This brochure supplement provides information about Brad Saenz that supplements the Coastwise Capital Group, LLC brochure. You should have received a copy of that brochure. Please contact Scott Kyle (CEO/Chief Investment Officer) if you did not receive the Coastwise Capital Group, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Brad Saenz is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Educational Background: Brad Saenz holds a Bachelor of Arts Degree in History with a minor concentration in Political Science from the University of South Carolina-Aiken (Sept. 1994-May 1999).

Date of birth: 1976

Business Experience: Mr. Saenz's financial industry experience includes serving as an operations and trading assistant for Allianz Global Investors (October 1999 to December 2012); an Operations Vice President in the investment division of MUFG Union Bank (2014-2016), and Operations Advisor for high-net-worth clients with CoastEdge Partners, LLC, a private equity hedge fund firm (2016-2018).

Item 3: Disciplinary Information

Brad Saenz (the "supervised person") has not been involved with any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person.

Item 4: Other Business Activities:

Mr. Saenz (the "supervised person") is not actively engaged in any investment-related business or occupation, including being registered, or having an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), or commodity trading advisor ("CTA"), nor is the supervised person an associated person of an FCM, CPO, or CTA.

Brad Saenz (the "supervised person") is not actively engaged in any business or occupation for compensation not discussed in response to Item 4. (A), above, that provides a substantial source of the supervised person's income or involves a substantial amount of the supervised person's time.

Item 5: Additional Compensation: Brad Saenz (the "supervised person") does not receive, from any non-Client, any economic benefit associated with advising Clients (such as sales awards and prizes, any bonus that is based on number or amount of sales, client referrals or new accounts, not including salary).

Item 6: Supervision Mr. Saenz is supervised by Scott G. Kyle, Chief Executive Officer. He reviews Mr. Saenz's work through frequent interactions.

Scott G. Kyle's contact information: PHONE: 858.454.6670

EMAIL: scott@coastwisegroup.com

Item 7: Requirements for State-Registered Advisers:

- (A) In addition to the events listed in Item 3 above, if the supervised person has been involved in one of the events listed below, disclose all material facts regarding the event:
- (i) An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
- a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or e. dishonest, unfair, or unethical practices.

Answer: None

- (ii) An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
- a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or e. dishonest, unfair, or unethical practices.

Answer: None

- (B) If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Answer: None