

# **Coastal Capital Group, Inc.**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 17, 2016**

This Form ADV2A (“Disclosure Brochure” provides information about the qualifications and business practices of Coastal Capital Group, Inc. (“Coastal Capital” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (978) 777-3116.

Coastal Capital is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”) located in Danvers, Massachusetts. The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Coastal Capital to assist you in determining whether to retain the Advisor.

Additional information about Coastal Capital and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or our CRD# **186511**.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Coastal Capital.

Coastal Capital believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Coastal Capital encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the initial distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Coastal Capital.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# **186511**. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (978) 777-3116.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Coastal Capital Group, Inc. (“Coastal Capital” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Corporation under the laws of the Commonwealth of Massachusetts. Principals and supervised persons of Coastal Capital have been providing advisory services since 2005 through LPL Financial LLC. In April 2015, Coastal Capital Group, Inc. was formed as a separate Corporation and became a registered investment advisor with the SEC. Coastal Capital is primarily owned by David A. Caruso (Founding Chairman / Managing Director) and James F. Horrocks (Managing Director). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Coastal Capital.

### **B. Advisory Services Offered**

Coastal Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and their retirement plans (each referred to as a “Client”).

#### Investment Management Services

Coastal Capital provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. Coastal Capital works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Coastal Capital will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, individual bonds and other types of investments, as appropriate, to meet the needs of its Clients.

Coastal Capital’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Coastal Capital will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Coastal Capital evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Coastal Capital may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Coastal Capital may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Coastal Capital may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Coastal Capital will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Coastal Capital accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

#### Financial Planning Services

Coastal Capital will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client’s financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Coastal Capital may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

#### Retirement Plan Advisory Services

Coastal Capital serves as a 3(21) Fiduciary to retirement plans (each a "Plan") in support of the Plan Sponsor. Coastal Capital provides the following Plan Fiduciary Services pursuant to the terms of the Advisor's agreement with each Plan Sponsor:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement
- Investment Monitoring
- Performance Reports
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Coastal Capital does not provide 3(38) discretionary investment advisory services on behalf of the Plan or Plan Sponsor.

Coastal Capital also provides communication and education services to the Plan and its Participants, pursuant to the terms of the Advisor's agreement with each Plan Sponsor:

- Direct employee contacts by phone, e-mail or letter upon eligibility to promote enrollment
- Investment education
- Regular on-site advisor visits with staff for account updates and reviews
- Periodic company-wide employee survey of retirement plan understanding
- Customer satisfaction surveys
- Periodic employee group education opportunities

#### **C. Client Account Management**

Prior to engaging Coastal Capital to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing Investment Policy – Coastal Capital, in connection with the Client, will assist in developing investment goals and objectives and the strategies to achieve those goals.
- Asset Allocation – Coastal Capital will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.

- Portfolio Construction – Coastal Capital will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Coastal Capital will provide investment management and ongoing oversight of the Client's portfolio and overall account.

Advisory Persons of Coastal Capital are also registered representatives of LPL Financial LLC ("LPL"). In their separate capacity as registered representatives, Advisory Persons may earn commissions on investment products implemented through LPL. The Advisor will not charge a Client an ongoing investment advisory fee if a commission is earned on the investment. Please see Item 10 below.

#### **D. Wrap Fee Programs**

Coastal Capital may pay the securities transaction fees for Client accounts as part of its overall investment advisory fee (See Item 5 – Fees and Compensation). The inclusion of these securities transaction costs into the investment advisory fee is generally considered a "Wrap Fee Program". While traditional wrap fee programs often have a defined set of investment options and uniform trading practices, Coastal Capital customizes its investment advisory services for its Clients. Coastal Capital's Wrap Fee Program merely provides for these services under a single annualized fee. A copy of this Wrap Fee Program Brochure is attached as Appendix 1 to this Disclosure Brochure and should always accompany this complete Disclosure Brochure.

#### **E. Assets Under Management**

As of December 31, 2015, Coastal Capital manages \$375,000,000 in assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting Coastal Capital.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of Coastal Capital and the Client.

#### **A. Fees for Advisory Services**

##### Investment Management Services

The investment advisory fee is paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. The investment advisory fee is based on the market value of assets under management at the end of the prior calendar quarter based on the following schedule:

Assets Under Management	Annual Rate
Up to \$499,999	1.25%
\$500,000 to \$999,999	1.15%
\$1,000,000 to \$1,999,999	1.00%
\$2,000,000 to \$3,499,999	0.85%
\$3,500,000 to \$4,999,999	0.75%
Over \$5,000,000	Negotiable

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Certain Clients may have fee schedules that differ from the schedule above. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Coastal Capital will be independently valued by the designated Custodian. Coastal Capital will not have the authority or responsibility to value portfolio securities.

##### Financial Planning Services

Coastal Capital offers financial planning services at an hourly rate of \$250 per hour or on a fixed fee per engagement ranging from \$1,500 to \$10,000. Fee may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and costs will be determined prior to establishing the

advisory relationship. The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees are based on the market value of assets in the Plan at the end of the prior calendar quarter. Fees are based on the following schedule:

Assets Under Management	Annual Rate
\$0 to \$3,500,000	0.500%
\$3,500,000 to \$5,000,000	0.400%
\$5,000,001 to \$7,500,000	0.300%
\$7,500,001 to \$10,000,000	0.250%
\$10,000,001 to \$15,000,000	0.225%
\$15,000,001 to \$20,000,000	0.200%
\$20,000,001 to \$35,000,000	0.175%
\$25,000,001 to \$50,000,000	0.150%
\$50,000,001 to \$75,000,000	0.125%
\$75,000,001 and Over	0.100%

Fees may be negotiable depending on the size and complexity of the Plan. Certain Clients may have fee schedules that differ from the schedule above.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Custodian, on behalf of the Advisor, calculates the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Coastal Capital at the end of the previous quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients provide written authorization permitting Coastal Capital to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are invoiced by the Advisor upon completion of the engagement deliverable[s] and are due upon receipt.

#### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Coastal Capital, in connection with investments made on behalf of the Client's account[s]. The Client may be responsible for custodial and securities transactions fees charged by the Custodian and executing broker-dealer. Clients participating in the Coast Capital Wrap Fee Program will have these fees included in the investment advisory fee.

In addition, all fees paid to Coastal Capital for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Coastal Capital, but would not receive the services provided by Coastal Capital which are designed, among other

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things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Coastal Capital to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management and Retirement Plan Advisory Services

Coastal Capital is compensated for its services in advance of the quarter in which advisory services are rendered. Either party may terminate the advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid advisory fees from the effective date of termination to the end of the quarter. The Client's advisory agreement[s] with the Advisor is non-transferable without the Client's written approval.

##### Financial Planning Services

Either party may terminate a planning agreement, at any time, by providing written notice to the other party. In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate or the percentage completion for a fixed fee engagement. Upon termination, any unearned, prepaid fees will be returned to the Client within five (5) business days of cancellation.

#### **E. Compensation for Sales of Securities**

Coastal Capital does not buy or sell securities to generate commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. As noted in Item 4, Advisory Persons of the Advisor are also registered representatives of LPL. In their separate capacity as registered representatives, Advisory Persons may earn commissions on investment products implemented through LPL. The Advisor will not charge a Client an ongoing investment advisory fee if a commission is earned on the investment. Please see Item 10 below.

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

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Coastal Capital does not charge performance-based fees for its investment advisory services. The fees charged by Coastal Capital are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

Coastal Capital does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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Coastal Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and their retirement plans. The relative percentage of each type of Client is available on Coastal Capital's Form ADV Part 1. These percentages will change over time. Coastal Capital generally does not impose a minimum account size for establishing a relationship.

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

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##### **A. Methods of Analysis**

Coastal Capital primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Coastal Capital is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, Coastal Capital generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Coastal Capital will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At



times, Coastal Capital may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Coastal Capital will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Coastal Capital or any of its employees.** Coastal Capital and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm or by our CRD# 145363.

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

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### Broker-Dealer Affiliation

Advisory Persons of Coastal Capital are also registered representatives of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In their separate capacity as registered representatives, Advisory Persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons of Coastal Capital. Neither Coastal Capital nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative. Generally, recommendations made by Coastal Capital to its Clients are implemented by Advisory Persons in their role as investment advisor representatives of Coastal Capital and not in their role as registered representatives of LPL. As such, Clients of Coastal Capital only pay advisory fees as described above. In no circumstances will Coastal Capital earn an advisory fee and a commission on the same investment.

#### Insurance Agency Affiliations

Certain Advisory Persons of Coastal Capital are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with Coastal Capital. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

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

#### **A. Code of Ethics**

Coastal Capital has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Coastal Capital (our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Coastal Capital and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Coastal Capital's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (978) 777-3116.

#### **B. Personal Trading with Material Interest**

Coastal Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Coastal Capital does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Coastal Capital does not have a material interest in any securities traded in Client accounts.

#### **C. Personal Trading in Same Securities as Clients**

Coastal Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Coastal Capital may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Coastal Capital requiring reporting of personal securities trades by its Supervised Persons for review by Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

#### **D. Personal Trading at Same Time as Client**

While Coastal Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

**At no time will Coastal Capital, or any Supervised Person of Coastal Capital, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Coastal Capital does not have discretionary authority to select the broker-dealer/Custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or Custodian (herein the "Custodian") to safeguard Client assets and authorize Coastal Capital to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Coastal Capital does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Coastal Capital does not exercise discretion over the selection of the Custodian, the Advisor will typically recommend a Custodian to Clients for execution and/or custodial services. Coastal Capital typically recommends to Clients that they established their brokerage account[s] at LPL Financial, LLC ("LPL"), where the Advisor maintains an institutional relationship and its Advisory Persons are also registered representatives of LPL's broker-dealer (Please see Item 10). The Advisor may be limited in using other custodians as any Custodian utilized by the Advisor must be approved by LPL. Coastal Capital also receives services from LPL that are described in Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Coastal Capital does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - Coastal Capital does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Coastal Capital will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Coastal Capital will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Coastal Capital will execute its transactions through an unaffiliated broker-dealer selected by the Client. Coastal Capital may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## Item 13 – Review of Accounts

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### A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by a Managing Director and/or the Chief Compliance Officer of Coastal Capital. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

## **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Coastal Capital if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

## **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Coastal Capital**

Coastal Capital does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Coastal Capital may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Coastal Capital may receive referrals of new Clients from a third-party.

#### Broker-Dealer Affiliation

Certain Advisory Persons of Coastal Capital are also registered representatives of LPL. In their separate capacity as registered representatives, Advisory Persons will receive commissions for the implementation of recommendations for commissionable transactions. Additional details are included in Item 10 above.

#### Insurance Agency Affiliations

Certain Advisory Persons of Coastal Capital are also licensed insurance professionals. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Additional details are included in Item 10 above.

#### Participation in Institutional Advisor Platform

LPL offers independent investment advisors with support services, which include custody of securities, trade execution, clearance and settlement of transactions. Coastal Capital receives various benefits from LPL through its relationship with them.

### **B. Client Referrals from Solicitors**

If a Client is introduced to Coastal Capital by either an unaffiliated or an affiliated solicitor (herein "Solicitor"), Coastal Capital may pay the Solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act as well as any applicable state securities regulations. Referral fees are paid solely from Coastal Capital's investment management fee and does not result in any additional charges or higher fees to the Client. The Solicitor will provide the Client with a copy of Coastal Capital's Disclosure Brochure along with a Solicitor's Disclosure Statement containing the terms and conditions of the solicitation arrangement including compensation.

## **Item 15 – Custody**

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Coastal Capital does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. All Clients must place their assets with a qualified Custodian. Clients are required to select their own Custodian to retain their funds and securities and direct Coastal Capital to utilize that Custodian for the Client's security transactions. Coastal Capital encourages Clients to review statements provided by the account Custodian. For more information about Custodians and brokerage practices, see "Item 12 - Brokerage Practices".

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**Coastal Capital Group, Inc.**

222 Rosewood Dr. 11th Floor \* Danvers, MA 01923

Phone: (978) 777-3116 \* Fax: (978) 777-3956

<http://coastalcapitalwealth.com>

## **Item 16 – Investment Discretion**

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Coastal Capital generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Coastal Capital. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Coastal Capital will be in accordance with each Client's investment objectives and goals.

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

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Coastal Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Coastal Capital, nor its management, has any adverse financial situations that would reasonably impair the ability of Coastal Capital to meet all obligations to its Clients. Neither Coastal Capital, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Coastal Capital is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**David A. Caruso, CFP®**  
**Founding Chairman / Managing Director**

**Effective: March 17, 2016**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of David A. Caruso (CRD# **719891**) in addition to the information contained in the Coastal Capital Group, Inc. (“Coastal Capital” or the “Advisor”) (CRD # 186511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Coastal Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 777-3116.

Additional information about Mr. Caruso is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

David A. Caruso, born in 1956, is dedicated to advising Clients of Coastal Capital in his role as the Founding Chairman and Managing Director. Mr. Caruso earned a Bachelor of Arts in Business/Finance from University of Massachusetts in 1980. Additional information regarding Mr. Caruso's employment history is included below.

### Employment History:

Founding Chairman / Managing Director, Coastal Capital Group, Inc.	04/2015 to Present
Registered Representative, LPL Financial LLC	03/2005 to Present
Investment Advisor Representative, LPL Financial LLC	03/2005 to Present
Financial Advisor, Morgan Stanley	11/1998 to 03/2005

### Certified Financial Planner™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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Coastal Capital Group, Inc.

222 Rosewood Dr. 11th Floor \* Danvers, MA 01923

Phone: (978) 777-3116 \* Fax: (978) 777-3956

<http://coastalcapitalwealth.com>



### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There have been no legal or disciplinary events required to be disclosed in response to this item. However, we do encourage you to independently view the background of Mr. Caruso on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or by his Individual CRD# **719891**.

### **Item 4 – Other Business Activities**

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#### Broker-Dealer Affiliation

Mr. Caruso is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein “LPL”). In his separate capacity as a registered representative, Mr. Caruso will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Caruso or Coastal Capital. Neither Coastal Capital nor Mr. Caruso will earn investment advisory fees in connection with any services implemented in Mr. Caruso’s separate capacity as a registered representative. Generally, recommendations made by Coastal Capital and Mr. Caruso to Clients are implemented in his role as an investment advisor representative of Coastal Capital and not in his role as a registered representative of LPL. In no circumstances will Coastal Capital or Mr. Caruso earn an ongoing advisory fee and a commission on the same investment.

#### Insurance Agency Affiliations

Mr. Caruso is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Caruso’s role with Coastal Capital. As an insurance professional, Mr. Caruso may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Caruso or the Advisor.

### **Item 5 – Additional Compensation**

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Mr. Caruso has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Caruso serves as the Founding Chairman / Managing Director of Coastal Capital and is also supervised from by Katelynn Kendall, the Chief Compliance Officer. Ms. Kendall can be reached at (978) 777-3116.

Coastal Capital has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Coastal Capital. Further, Coastal Capital is subject to regulatory oversight by various agencies. These agencies require registration by Coastal Capital and its employees. As a registered entity, Coastal Capital is subject to examinations by regulators, which may be announced or unannounced. Coastal Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**James F. Horrocks, CFP<sup>®</sup>, AIF<sup>®</sup>**  
**CEO / Managing Director**

**Effective: March 17, 2016**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of James F. Horrocks (CRD# **2468549**) in addition to the information contained in the Coastal Capital Group, Inc. (“Coastal Capital” or the “Advisor”) (CRD # 186511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Coastal Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 777-3116.

Additional information about Mr. Horrocks is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

James F. Horrocks, born in 1970, is dedicated to advising Clients of Coastal Capital in his role as the CEO and Managing Director. Mr. Horrocks earned a Masters of Business Administration in Finance and Financial Management Services from Boston University Graduate School of Management in 1995. Mr. Horrocks also earned his Bachelor of Science Degree in Finance and Financial Management Services from the University of Massachusetts, Amherst in 1993. Additional information regarding Mr. Horrocks' employment history is included below.

### Employment History:

Managing Director, Coastal Capital Group, LLC	04/2015 to Present
Registered Representative, LPL Financial LLC	11/1996 to Present
Investment Adviser Representative, LPL Financial LLC	11/1996 to Present
Investment Adviser Representative, Northeast Planning Associates, Inc.	10/2010 to 12/2014

### Certified Financial Planner™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Accredited Investment Fiduciary ("AIF®")**

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company. The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® and AIF® designation have been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

### **Item 3 – Disciplinary Information**

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There have been no legal or disciplinary events required to be disclosed in response to this item. However, we do encourage you to independently view the background of Mr. Horrocks on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or by his Individual CRD# **2468549**.

### **Item 4 – Other Business Activities**

#### **Broker-Dealer Affiliation**

Mr. Horrocks is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In his separate capacity as a registered representative, Mr. Horrocks will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Horrocks or Coastal Capital. Neither Coastal Capital nor Mr. Horrocks will earn investment advisory fees in connection with any services implemented in Mr. Horrocks' separate capacity as a registered representative. Generally, recommendations made by Coastal Capital and Mr. Horrocks to Clients are implemented in his role as an investment advisor representative of Coastal Capital and not in his role as a registered representative of LPL. In no circumstances will Coastal Capital or Mr. Horrocks earn an ongoing advisory fee and a commission on the same investment.

#### **Insurance Agency Affiliations**

Mr. Horrocks is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Horrocks' role with Coastal Capital. As an insurance professional, Mr. Horrocks may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Horrocks or the Advisor.

### **Item 5 – Additional Compensation**

Mr. Horrocks has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Horrocks serves as the CEO and Managing Director of Coastal Capital and is supervised by Katelynn Kendall, the Chief Compliance Officer. Ms. Kendall can be reached at (978) 777-3116.

Coastal Capital has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Coastal Capital. Further, Coastal Capital is subject to regulatory oversight by various agencies. These agencies require registration by Coastal Capital and its employees. As a registered entity, Coastal Capital is subject to examinations by regulators, which may be announced or unannounced. Coastal Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Neil J. Tremblay**  
**Managing Director of Institutional Services**

**Effective: March 17, 2016**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Neil J. Tremblay (CRD# **1559290**) in addition to the information contained in the Coastal Capital Group, LLC (“Coastal Capital” or the “Advisor”) (CRD # 186511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Coastal Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 777-3116.

Additional information about Mr. Tremblay is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Neil J. Tremblay, born in 1964, is dedicated to advising Clients of Coastal Capital in his role as the Managing Director of Institutional Services. Mr. Tremblay earned a Masters of Business Administration from Marquette University in 1991 and a Bachelor of Arts in Business Administration from Marquette University in 1986. Additional information regarding Mr. Tremblay's employment history is included below.

### Employment History:

Managing Director of Institutional Services, Coastal Capital Group, LLC	04/2015 to Present
Registered Representative, LPL Financial, LLC	01/2015 to Present
Investment Advisor Representative, LPL Financial, LLC	03/2015 to Present
Vice President, Arrowstreet Capital, Limited Partnership	09/2011 to 11/2014
Vice President, State Street Global Advisors	04/1996 to 08/2011

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. There have been no legal or disciplinary events required to be disclosed in response to this item. However, we do encourage you to independently view the background of Mr. Tremblay on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or by his Individual CRD# **1559290**.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Tremblay is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In his separate capacity as a registered representative, Mr. Tremblay will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Tremblay or Coastal Capital. Neither Coastal Capital nor Mr. Tremblay will earn investment advisory fees in connection with any services implemented in Mr. Tremblay's separate capacity as a registered representative. Generally, recommendations made by Coastal Capital and Mr. Tremblay to Clients are implemented in his role as an investment advisor representative of Coastal Capital and not in his role as a registered representative of LPL. In no circumstances will Coastal Capital or Mr. Tremblay earn an ongoing advisory fee and a commission on the same investment.

## Item 5 – Additional Compensation

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Mr. Tremblay has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Tremblay serves as the Managing Director of Institutional Services of Coastal Capital and is supervised by Katelynn Kendall, the Chief Compliance Officer. Ms. Kendall can be reached at (978) 777-3116.

Coastal Capital has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Coastal Capital. Further, Coastal Capital is subject to regulatory oversight by various agencies. These agencies require registration by Coastal Capital and its employees. As a registered entity, Coastal Capital is subject to examinations by regulators, which may be announced or unannounced. Coastal Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# **Form ADV Part 2B – Brochure Supplement**

**for**

**Sean P. Gibbons, CFP<sup>®</sup>, AIF<sup>®</sup>**  
**Financial Advisor**

**Effective: March 17, 2016**

This Form ADV2B ("Brochure Supplement") provides information about the background and qualifications of Sean P. Gibbons (CRD# **2553188**) in addition to the information contained in the Coastal Capital Group, LLC ("Coastal Capital" or the "Advisor") (CRD # 186511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Coastal Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 777-3116.

Additional information about Mr. Gibbons is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Sean P. Gibbons, born in 1971, is dedicated to advising Clients of Coastal Capital in his role as a Financial Advisor. Mr. Gibbons earned a Masters in Business Administration from Boston University in 1998 and a Bachelor in Arts from the University of Massachusetts at Amherst in 1993. Additional information regarding Mr. Gibbons's employment history is included below.

### Employment History:

Financial Advisor, Coastal Capital Group, Inc.	04/2015 to Present
Registered Representative, LPL Financial, LLC	11/2006 to Present
Investment Advisor Representative, LPL Financial, LLC	11/2006 to Present
Vice President, Integrated Financial Partners, Inc.	12/2006 to 06/2012
Vice President, Factset Research Systems	06/2000 to 10/2006

### Certified Financial Planner™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Accredited Investment Fiduciary ("AIF®")**

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company. The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary® and AIF® designation have been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There have been no legal or disciplinary events required to be disclosed in response to this item. However, we do encourage you to independently view the background of Mr. Gibbons on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or by his Individual CRD# **2553188**.

### **Item 4 – Other Business Activities**

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#### **Broker-Dealer Affiliation**

Mr. Gibbons is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In his separate capacity as a registered representative, Mr. Gibbons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Gibbons or Coastal Capital. Neither Coastal Capital nor Mr. Gibbons will earn investment advisory fees in connection with any services implemented in Mr. Gibbons' separate capacity as a registered representative. Generally, recommendations made by Coastal Capital and Mr. Gibbons to Clients are implemented in his role as an investment advisor representative of Coastal Capital and not in his role as a registered representative of LPL. In no circumstances will Coastal Capital or Mr. Gibbons earn an ongoing advisory fee and a commission on the same investment.

#### **Insurance Agency Affiliations**

Mr. Gibbons is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Gibbons' role with Coastal Capital. As an insurance professional, Mr. Gibbons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Gibbons or the Advisor.

### **Item 5 – Additional Compensation**

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Mr. Gibbons has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Gibbons serves as a Financial Advisor of Coastal Capital and is supervised by Katelynn Kendall, the Chief Compliance Officer. Ms. Kendall can be reached at (978) 777-3116.

Coastal Capital has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Coastal Capital. Further, Coastal Capital is subject to regulatory oversight by various agencies. These agencies require registration by Coastal Capital and its employees. As a registered entity, Coastal Capital is subject to examinations by regulators, which may be announced or unannounced. Coastal Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**William A. Horrocks  
Financial Advisor**

**Effective: March 17, 2016**

This Form AD2B (“Brochure Supplement”) provides information about the background and qualifications of William A. Horrocks (CRD# **250445**) in addition to the information contained in the Coastal Capital Group, Inc. (“Coastal Capital” or the “Advisor”) (CRD # 186511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Coastal Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 777-3116.

Additional information about Mr. Horrocks is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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William A. Horrocks, born in 1944, is dedicated to advising the Clients of Coastal Capital in his role as a Financial Advisor. Mr. Horrocks didn't attend school after achieving his high school diploma. Additional information regarding Mr. Horrocks's employment history is included below.

### Employment History:

Financial Advisor, Coastal Capital Group, Inc.	04/2015 to Present
Registered Representative, LPL Financial	12/1989 to Present
Financial Advisor, LPL Financial	06/1995 to Present

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There have been no legal or disciplinary events required to be disclosed in response to this item. However, we do encourage you to independently view the background of Mr. Horrocks on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or by his Individual CRD# **250445**.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Horrocks is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In his separate capacity as a registered representative, Mr. Horrocks will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Horrocks. Neither the Advisor nor Mr. Horrocks will earn investment advisory fees in connection with any services implemented in Mr. Horrocks' separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by Coastal Capital to its Clients are implemented by Mr. Horrocks in his role as a Financial Advisor, not in his role as a Registered Representative. As such, Clients of Coastal Capital will only pay advisory fees as described above. In no circumstances will Coastal Capital earn an advisory fee and a commission on the same investment. In the event that Mr. Horrocks earns a commission on an investment, the advisory fee will be waived by Coastal Capital.

### Insurance Agency Affiliations

Mr. Horrocks is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Horrocks' role with Coastal Capital. As an insurance professional, Mr. Horrocks may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Horrocks or the Advisor.

## Item 5 – Additional Compensation

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Mr. Horrocks has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Horrocks serves as the Financial Advisor of Coastal Capital and is supervised by Katelynn Kendall, the Chief Compliance Officer. Ms. Kendall can be reached at (978) 777-3116.

Coastal Capital Group, Inc.  
222 Rosewood Dr. 11th Floor \* Danvers, MA 01923  
Phone: (978) 777-3116 \* Fax: (978) 777-3956  
<http://coastalcapitalwealth.com>

Coastal Capital has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Coastal Capital. Further, Coastal Capital is subject to regulatory oversight by various agencies. These agencies require registration by Coastal Capital and its employees. As a registered entity, Coastal Capital is subject to examinations by regulators, which may be announced or unannounced. Coastal Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Kimberly A. Segal, CFP®  
Director of Relationship Management**

**Effective: March 17, 2016**

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Kimberly A. Segal (CRD# **2320442**) in addition to the information contained in the Coastal Capital Group, Inc. (“Coastal Capital” or the “Advisor”) (CRD # 186511) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Coastal Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 777-3116.

Additional information about Ms. Segal is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Kimberly A. Segal, born in 1970, is dedicated to advising Clients of Coastal Capital in her role as the Director of Relationship Management. Ms. Segal earned a B.S. in Business Management from Boston University in 1992. Additional information regarding Ms. Segal's employment history is included below.

### Employment History:

Director of Relationship Management, Coastal Capital Group, Inc.	10/2015 to Present
Registered Representative, LPL Financial LLC	10/2015 to Present
Financial Consultant, Charles Schwab & Co., Inc.	06/1999 to 09/2015

### Certified Financial Planner™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There have been no legal or disciplinary events required to be disclosed in response to this item. However, we do encourage you to independently view the background of Ms. Segal on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his name or by his Individual CRD# **2320442**.

### **Item 4 – Other Business Activities**

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#### Broker-Dealer Affiliation

Ms. Segal is also a registered representative of LPL Financial LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein “LPL”). In her separate capacity as a registered representative, Ms. Segal will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Segal or Coastal Capital. Neither Coastal Capital nor Ms. Segal will earn investment advisory fees in connection with any services implemented in Ms. Segal’s separate capacity as a registered representative. Generally, recommendations made by Coastal Capital and Ms. Segal to Clients are implemented in her role as an investment advisor representative of Coastal Capital and not in her role as a registered representative of LPL. In no circumstances will Coastal Capital or Ms. Segal earn an ongoing advisory fee and a commission on the same investment.

### **Item 5 – Additional Compensation**

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Ms. Segal has additional business activities that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Ms. Segal serves as the Director of Relationship Management of Coastal Capital and is supervised by Katelynn Kendall, the Chief Compliance Officer. Ms. Kendall can be reached at (978) 777-3116.

Coastal Capital has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Coastal Capital. Further, Coastal Capital is subject to regulatory oversight by various agencies. These agencies require registration by Coastal Capital and its employees. As a registered entity, Coastal Capital is subject to examinations by regulators, which may be announced or unannounced. Coastal Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Coastal Capital Group, Inc.**

## **Form ADV Part 2A Appendix 1 ("Wrap Fee Program Brochure")**

**Effective: March 17, 2016**

This Form ADV2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for Coastal Capital Group, Inc. ("Coastal Capital" or the "Advisor") services when Client transaction costs are combined with investment advisory fees. This Wrap Fee Program Brochure shall always be accompanied by the Coastal Capital Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete Coastal Capital Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the Coastal Capital Disclosure Brochure, please contact us at (978) 777-3116.

Coastal Capital is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about Coastal Capital to assist you in determining whether to retain the Advisor.

Additional information about Coastal Capital and its Advisory Persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

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Form ADV 2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses wrap fee program offered by the Advisor.

### Material Changes

There have been no material changes to our Wrap Fee Program Brochure since the last time we delivered this brochure.

### Future Changes

From time to time, we may amend this Wrap Fee Program Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete Coastal Capital Disclosure Brochure) or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Coastal Capital.

At any time, you may view the current Disclosure Brochure including this Wrap Fee Program Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or our firm CRD# **186511**. You may also request a copy of this Wrap Fee Program Brochure at any time, by contacting us at (978) 777-3116.

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## Item 4 – Services Fees and Compensation

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### A. Services

Coastal Capital provides customized wealth advisory services for its Clients. The Coastal Capital Wrap Fee Program (the “Wrap Fee Program”) is a fee methodology that includes the investment advisory services provided by Coastal Capital along with the normal trading costs for securities transactions.

Coastal Capital provides customized investment advisory solutions for its Clients, which are described in detail on Item 4 of the attached Form ADV2A – Disclosure Brochure. The Wrap Fee Program Program is not a different investment approach or service offering. It is simply a combined fee.

Certain details of this Wrap Fee Program are contained in this Appendix 1, but it shall often reference back to the Form ADV2A – Disclosure Brochure which provides all details regarding the advisory services of Coastal Capital. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Coastal Capital’s investment philosophy and related services.**

### B. Program Costs

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the preceding quarter. Investment advisory fees range from an annual rate of 1.25% to 0.75% based on the size and complexity of the Client relationship.

Services provided under this Wrap Fee Program may cost the Client more or less than paying for investment management services and transaction costs separately. The Frequency of trading, size of accounts and the securities used to construct a portfolio are factors that drive the overall cost of managing a portfolio. Additional information regarding fees are included in Item 5 of Form ADV Part 2A – Disclosure Brochure.

Coastal Capital provides this Wrap Fee Program to provide a single fee that includes investment management and all normal securities transactions costs associated with Coastal Capital investment strategies. The Wrap Fee Program does not include securities transaction fees for Client-directed transactions. Further, the Wrap Fee Program does not include the underlying expenses of mutual funds and exchange-traded funds, which are deducted directly from these investments. Please see Item C. Fees below as well as Item 5.C. of the Disclosure Brochure. **Please see Item 5 – Fees and Compensation.**

### C. Fees

The Coastal Capital Wrap Fee Program includes typical securities trading costs incurred in connection with the discretionary investment management services provided by Coastal Capital. There are other fees charged by unaffiliated third parties that Clients should fully understand. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

### D. Compensation

Coastal Capital is the sponsor and portfolio manager of this Wrap Fee Program. Coastal Capital receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the normal trading activity in the Client’s account[s].

## Item 5 – Account Requirements and Types of Clients

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Coastal Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and their retirement plans. Coastal Capital generally does not impose a minimum account size for establishing a relationship. **Please see Item 7 of the Disclosure Brochure for additional details.**



## Item 6 – Portfolio Manager Selection and Evaluation

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### A. Portfolio Manager Selection

Coastal Capital serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

### B. Related Persons

Coastal Capital personnel serve as the portfolio manager for all advisory accounts, including accounts under this Wrap Fee Program. Coastal Capital does not serve as a portfolio manager for any third party wrap fee programs.

### C. Supervised Persons

Coastal Capital supervised persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

### B. Methods of Analysis and Risk of Loss

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor. Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

#### Performance-Based Fees

Coastal Capital does not charge performance-based fees.

#### Proxy Voting

Coastal Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## Item 7 – Client Information Provided to Portfolio Managers

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Coastal Capital is required to describe the type and frequency of the information it communicates to any external managers that may be involved in managing its Clients' investment portfolios. Coastal Capital serves as the sole portfolio manager under this Wrap Fee Program and, as such, the Advisor has no information to disclose in relation to regarding this Item.

## Item 8 – Client Contact with Portfolio Managers

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Coastal Capital is the sponsor and sole portfolio manager for this Wrap Fee Program. There is no restriction on the Client's ability to contact Coastal Capital.

## Item 9 – Additional Information

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### A. Disciplinary Information and Other Financial Industry Activities and Affiliations

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose.***

#### Other Financial Activities and Affiliations

Please see Items 10 and 14 of the Coastal Capital Disclosure Brochure as well as Items 4 and 5 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure).

**B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

Coastal Capital has implemented a Code of Ethics that defines our fiduciary commitment to each Client. Details of this Code of Ethics and related practices are included in item 11 of the Disclosure Brochure.

Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by a Managing Director and/or the Chief Compliance Officer of Coastal Capital. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. Details of the review policies and practices are provided in Item 13 of the Disclosure Brochure.

Other Compensation

Please see Item 14 – Other Compensation in the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by Coastal Capital or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

Financial Information

Neither Coastal Capital, nor its management has any adverse financial situations that would reasonably impair the ability of Coastal Capital to meet all obligations to its Clients. Neither FWA, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. FWA is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 of the Disclosure Brochure.

## Privacy Policy

Effective: March 17, 2016

### Our Commitment to You

Coastal Capital Group, Inc. ("Coastal Capital" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Coastal Capital (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Coastal Capital does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, Custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Coastal Capital does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Coastal Capital or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Coastal Capital does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (978) 777-3116.