

Capstar Financial Services LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Capstar Financial Services LLC. If you have any questions about the contents of this brochure, please contact us at (512) 215-9030 or by email at: operations@capstarfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Capstar Financial Services LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Capstar Financial Services LLC's CRD number is: 300349.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Capstar Financial Services LLC on 03/24/2022 are described below. Material changes relate to Capstar Financial Services LLC's policies, practices, or conflicts of interests.

- There are no material changes to report.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Capstar Financial Services LLC (hereinafter “Capstar Financial”) is a corporation organized in the State of Texas. The firm was formed in September 2009, and the principal owner is Suzette Marie Porter. The firm is registered as an RIA with the state of Texas and has an application for registration with the SEC.

B. Types of Advisory Services

Portfolio Management Services

Capstar Financial offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Capstar Financial creates an analysis for each client, which outlines the client's current situation (income, tax levels, expenses, assets). Each client must complete a risk tolerance questionnaire. Once all the information is gathered Capstar Financial will construct a plan to aid in the selection of a portfolio that matches each client's specific situation. Capstar may select certain Third-Party Money Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages a Third-Party Money Manager may be set forth in a separate written agreement with the designated Third-Party Money Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Third-Party Money Managers engaged to manage their assets. Portfolio management services include, but not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Capstar Financial evaluates the current investments of each client with the respect to their risk tolerance levels and time horizon. Capstar Financial and Third-Party Money Managers will request discretionary authority from the clients to select and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement.

Capstar Financial seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Capstar Financials' economic, investment or other financial interests. To meet its fiduciary obligations, Capstar Financial attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios.

Financial Planning

Financial plans and financial planning may include but are not limited to investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Educational Seminars/Workshops

Capstar Financial provides periodic educational seminars and workshops to [clients and the general public].

Selection of Third-Party Money Managers

Our firm evaluates a variety of information about Third-Party Money Managers, which includes the Third-Party Money Managers' public disclosure documents, materials supplied by the Third-Party Money Managers themselves, and other third-party analyses it believes are reputable. To the extent possible, the firm seeks to assess the Third-Party Money Managers' investment strategies, past performance, and risk results in relation to its clients' individual portfolio allocations and risk exposure. Our firm also takes into consideration each Third-Party Money Manager's management style, returns, reputation, financial strength, reporting, pricing, and research capabilities, among other factors.

Our firm continues to provide services relative to the discretionary or non-discretionary selection of the Third-Party Money Managers. On an ongoing basis, the firm monitors the performance of those accounts being managed by Third-Party Money Managers. Our firm seeks to ensure the Third-Party Money Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Services Limited to Specific Types of Investments

Capstar Financial generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/ inflation linked bonds, non-U.S. securities and private placements. Capstar Financial may use other securities as well to help diversify a portfolio when applicable. Capstar Financial will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Capstar Financial on behalf of the client. Capstar Financial can use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Capstar Financial from properly servicing the client account, or if the restrictions would require Capstar Financial to deviate from its standard suite of services, Capstar Financial reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Capstar Financial does not participate in wrap fee programs.

E. Assets Under Management

Capstar Financial has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$126,131,547	\$199,929	December 2022

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management fees

Total Assets Under Management	Annual Fees
\$0.00 - \$250,000	Up to 2.00%
\$250,000 — and up	Up to 1.75%

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period. Fees are billed quarterly upfront. If a client starts investing in the middle of a billing cycle the fees will be pro-rated.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. If a client has multiple accounts, Capstar Financial will aggregate the account balances to lower the fees. Clients may terminate the agreement without penalty for a full refund of Capstar Financials' fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice, and the fees will be pro-rated.

Financial Planning fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between \$500 and \$5,000.

Clients may terminate the agreement without penalty, for full refund of Capstar Financials' fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Educational Seminar/Workshop fees

Capstar Financial will charge no fee for a retirement elevated course.

Selection of Other Advisers Fees

In addition to the advisory fees paid to Capstar, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs, fees attributable to alternative assets utilized by the Third-Party Money Managers, reporting charges, fees charged by the Third-Party Money Managers, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer

and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12, below.

Adviser will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will Adviser accept or maintain custody of a client's funds or securities except for authorized fee deduction. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. Adviser may act at the client's convenience to facilitate such written communications to the Custodian, provided that such action is not construed to be custody of client assets.

B. Payment of Fees

Payment of Portfolio Management fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fee's are paid in advance; however fee schedules may be dependent on the asset manager used and will be definitively outlined in client agreements.

Payment of Financial Planning fees

Financial planning fees are generally paid via check for non-clients.

Fixed financial planning fees are paid 100% in advance, but never more than six months in advance.

Payment of Third-Party Money Managers fees

The timing, frequency, and method of paying fees for selection of Third-Party Money Managers will depend on the specific Third-Party Money Manager selected and will be disclosed to the client prior to entering a relationship with the Third-Party Money Manager.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Capstar Financial. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of fees

Capstar Financial collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.) Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation for the Sale of Securities to Clients

Neither Capstar Financial nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual fund securities

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

Capstar Financial does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Capstar Financial generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Small Businesses

There is an account minimum of \$250,000, which may be waived by Capstar Financial in its discretion.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Capstar Financial's methods of analysis include Modern portfolio theory and Technical analysis.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

Technical analysis involves the analysis of past market data, primarily price and volume.

Investment Strategies

Capstar Financial uses long term trading and short-term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile — i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Solicitor Services/ Capstar Financial of Other Advisers: Although Capstar Financial will seek to select only money managers who will invest clients' assets with the highest level of integrity, Capstar Financials' selection process cannot ensure that money managers will perform as desired and Capstar Financial will have no control over the day-to-day operations of any of its selected money managers. Capstar Financial would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

Suzette Porter is a key person of Capstar Financial, and the company heavily relies on her. To minimize the risk in the event of the loss of Suzette Porter a succession plan is set-up to be able to continue the business without major interruption.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

A. Risks of Specific Securities Used

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/ inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment in the future. Annuities are contracts issued by a life insurance company designed to meet retirement or other long-term goals. Insurance and Annuity product guarantees are subject to the claim-paying ability of the issuing company. Fixed indexed annuities are not stock market investments. Market indexes do not include dividends paid on the underlying stocks and do not therefore reflect the total return of the underlying stocks. Guarantees provided by annuities are subject to the financial strength of the issuing company and are not guaranteed by a bank or the FDIC. An annuity is not a life insurance policy.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Non-U.S. securities present certain risks such as currency fluctuation, political and

economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Capstar Financial nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Capstar Financial nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Firm policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest involving its business relationships that might reasonably compromise its impartiality or independence.

Advisers providing investment advice on behalf of the firm, in their individual capacity, may be an agent for various insurance companies. As such, they are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage them when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. Clients should be aware that the receipt of additional compensation creates a conflict of interest that may impair objectivity when making advisory recommendations. PorterPorter

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Capstar Financial does utilize Third-Party Money Managers. The annual/ quarterly fees are shared between Capstar Financial and the Third-Party Money Manager. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that Capstar Financial has an incentive to direct clients to the third-party investment advisers that provide Capstar Financial with a larger fee split. Capstar Financial will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. Capstar Financial will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where Capstar Financial is recommending the adviser to clients.

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

A. Code of Ethics

Capstar Financial has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Capstar Financials' Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Capstar Financial will not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest. (Examples of a material financial interest would include acting as a principal, general partner of a partnership/fund where clients are solicited to invest or acting as an investment advisor to and investment Company that the firm recommends to clients.)

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Capstar Financial may buy or sell securities for themselves that they also recommend to clients. The COO will always document any transactions that could be constructed as conflicts of interest and Capstar Financial will always transact client business before its own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Capstar Financial may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Capstar Financial to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. When similar securities are being bought or sold, Capstar Financial employees

will either transact clients' transaction before their own or will transact alongside clients' transactions in block or bunch trade.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Capstar Financials' duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Capstar Financial may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Capstar Financials' research efforts. Capstar Financial will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Capstar recommends clients to use Fidelity Brokerage Services LLC.

1. *Research and Other Soft-Dollar Benefits*

While Capstar Financial has no formal soft dollars program in which soft dollars are used to pay for third party services, Capstar Financial may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Capstar Financial may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Capstar Financial does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Capstar Financial benefits by not having to produce or pay for the research, products or services, and Capstar Financial will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Capstar Financials' acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

Capstar Financial receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker Dealer/Custodian to use*

Capstar Financial will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

Capstar Financial does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

C. Third Party Money Managers

Third Party Money Managers may utilize different broker-dealers/custodians as mentioned above, and may also aggregate or block trade. Please refer to each Third Party Money Managers disclosure brochure.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Capstar Financials' advisory services provided on an ongoing basis are reviewed at least Quarterly by Suzette M Porter, Advisor, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Capstar Financial are assigned to this reviewer. On at least an annual basis we will reach out to clients to confirm each client's profile information is accurate and up to date and when necessary, update a client's profile information. In the first year new clients have quarterly reviews and will then have semi-annual or annual reviews based on the clients' preference.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Suzette M Porter, Advisor. Financial planning clients are provided a one- time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Capstar Financials' services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Capstar Financials' advisory services provided on an ongoing basis will receive a monthly statement detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from Fidelity Investments. Quarterly Reviews are provided by AssetMark.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Capstar Financial receives compensation from third-party advisers to which it directs clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

Capstar Financial does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Capstar Financial will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Capstar Financial provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Capstar Financial generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Capstar Financials' discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Capstar Financial.

Item 17: Voting Client Securities (Proxy Voting)

Capstar Financial will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Third Party Money Managers may utilize a different proxy voting policy than mentioned above. Please refer to each Third Party Money Managers disclosure brochure.

Item 18: Financial Information

A. Balance Sheet

Capstar Financial neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Capstar Financial nor its management has any financial condition that is likely to reasonably impair Capstar Financials' ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Capstar Financial has not been the subject of a bankruptcy petition in the last ten years.
