

**R. Seeger Wealth Management, LTD**

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This brochure provides information about the qualifications and the business practices of R. Seeger Wealth Management. If you have any questions about the contents of this brochure, please contact us at 631-592-9729 and/or [RichardSeeger@rswmltd.com](mailto:RichardSeeger@rswmltd.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 R. Seeger Wealth Management, LTD also is available on the SEC's website at [www.advisorinfo.sec.gov.com](http://www.advisorinfo.sec.gov.com).

The term "Registered Investment Adviser" does not imply a certain level of skill or training.

The material changes in this brochure from the last annual updating amendment of R. Seeger Wealth Management, LTD on 03/28/2023 are described below. Material changes relate to R. Seeger Wealth Management, LTD policies, practices or conflicts of interests only.

- R. Seeger Wealth Management may also be deemed to have custody over the funds and securities of trust accounts for which it or its related persons serve as trustee. (Item 15)

## Table of Contents

Organization.....	1
Material changes.....	2
Table of contents.....	3
Advisory Business.....	4
Types of investments.....	4
Fees & Compensation.....	5
Performance based fees/ side by side management.....	6
Types of Clients.....	7
Methods of analysis.....	8
Investment strategies.....	8
Risk of Loss.....	8
Disciplinary Information.....	9
Financial Industry Activities & Affiliations.....	10
Code of Ethics.....	11
Participation/interest in Client Transactions.....	11
Personal Trading.....	11
Brokerage practices.....	12
Review of accounts.....	13
Client referrals/other compensation.....	14
Custody.....	15
Investment discretion.....	16
Voting Client Securities.....	17
Financial Information.....	18
Education & Business background.....	19
Material events other disclosures.....	19

### **Advisory Business**

R. Seeger Wealth Management has been in business since January 26, 2010.

The Principal owner is R. Seeger Wealth Management as noted on Schedule A Part 1A.

At R. Seeger Wealth Management, we concentrate on asset allocation with the use of managed mutual and index funds, exchange traded funds, bond funds, and individual bonds. We do not market time or use market timing. Our implementation of financial planning exists if we possess client's assets under management. If a client has a need for Financial Planning, and we do not have any assets under management we will bill the client separately, which is reflected under Item 5, Fees and Compensation on page 6.

Advisory services are tailored to the needs of the clients'. To make our decisions we take into consideration the clients': Risk Tolerance, Longevity, Age, Income, Financial needs, Liquidity, Investable assets and Net Worth.

The clients' may *not* impose restrictions on investing in certain securities or types of securities.

R. Seeger Wealth Management acts as portfolio manager for and sponsor of a wrap fee program, which is an investment program where the client pays one stated fee that includes management fees and transaction costs. RSWM manages the investments in the wrap fee program but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts. Fees paid under the wrap fee program will be given to R. Seeger Wealth Management as a management fee. Please see our wrap program brochure for additional information.

Currently, we have \$39,149,000.00 in discretionary assets under management as of December 2022.

## Fees & Compensation

### (A) Fee Schedules

Asset Management Fees	
Account Value	Management fee
\$100,000 to \$150,000	1.25% per year
\$150,001 to \$1,750,000	1.00% per year
\$1,750,001 to \$4,000,000	.75% per year
\$4,000,001 +	.60% per year

Fees are negotiable, and clients can combine related accounts for fee purpose.

For clients who do not have assets under management, financial planning fees are charged at the rate of \$375/hour with a minimum of one hour.

(B) R. Seeger Wealth Management charges an annual management fee, billed quarterly, based on percentage of assets under management on the last day of the quarter, 3-31, 6-30, 9-30, 12-31. Fees are paid quarterly in arrears and are based on value at the end of each quarter. Fees will be debited directly from the custodian holding clients' assets.

Financial planning fees are billed at the time services are provided.

(C) Clients are not responsible for custodial expenses. The client will in fact incur expenses that each respective fund/ETF company charges.

(D) Our clients do not pay fees in advance. The advisory service agreement can be terminated by either party at any time. If the client chooses to terminate the relationship, it needs to be done in writing, once received the service will be cancelled. The client will be responsible for the management fees leading up to the day of cancellation. If we decide to terminate the relationship, we will give the clients' 30 days written notice. There are no additional charges or penalties if client decides to terminate the relationship.

(E) At R. Seeger Wealth Management, we do not accept compensation/commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds and or ETF's.

### **Performance-Based Fees & Side by Side Management**

R. Seeger Wealth Management does not participate in performance-based fees on any level.

### **Type of Clients**

Our client based consists of individuals, business, trusts, and Individual Retirement Arrangements. The minimal initial investment is \$100,000.00 of investable assets, exclusive of family house held accounts. Exceptions can be made.

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

- (A) R. Seeger Wealth Management makes use of Morningstar's Adviser programs and its research materials. The Morningstar portfolio application allows us to view investment expenses, asset allocation, fund manager tenure, historical fund performance, and sector overweight/underweight. We also make use of other websites including but not exclusive to Charles Schwab. Although we monitor the accounts daily that does not mean we will make changes daily, this is not our philosophy. Clients are made aware of the possibility of loss, and all investments have the risk of loss of principle and should be prepared to bear such a loss.
- (B) Our investment strategies typically contain anywhere from 20% equity exposure to 90% equity exposure, every client being different. Foreign investments consist of a broad international exposure; we do not take on risk of specific countries. We do not trade frequently for many reasons. The main reason is it's not our philosophy of investing. Frequent trading may have tax implications, and most importantly deterioration in potential performance. We will invest most of our equity positions in large capitalization type funds followed by a smaller position in Middle capitalization and smaller capitalization funds. Our bond investing strategies will consist of several bond funds, bond Exchange Traded Funds, and individual bonds with various durations. All investments, both equities and fixed income share potential risks, to list a few: interest rate risk, political risk, global risk, default risk, reinvestment risk, liquidity risk, inflation- risk, legislative risk, credit risk, and market risk.
- (C) The primary investments used by R. Seeger Wealth Management are relatively mainstream types of bond, equities/individual stocks, and equity investments with low costs. We do not use options or futures trading or other types of derivative/exotic investment strategies.



### **Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or perspective client's evaluation of R. Seeger Wealth Management advisory business or the integrity of R. Seeger Wealth Management. There are no material facts to disclose regarding any event.

### **Other Financial Industry Activities & Affiliations**

In addition, if a client has a need for Insurance/Long term care provider I will recommend a vendor. I will not participate in any shared commissionable sales on any level for any products.

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

(A) The following is a brief description of the code of ethics. I will provide a copy to an existing client or prospective client upon request.

### *Code of Ethics and Professional Responsibility*

- Integrity-Provide professional services with integrity.
- Objectivity-Provide professional services objectively.
- Competence-Maintain the knowledge and skill necessary to provide professional services competently.
- Fairness-Be fair and reasonable in all professional relationships. Disclose conflicts of interest.
- Confidentiality-Protect the confidentiality of all client information.
- Professionalism-Act in a manner that demonstrates exemplary professional conduct.
- Diligence-Provide professional services diligently.

Participation or interests in client transactions:

(B) R. Seeger Wealth Management does not recommend securities to clients in which the firm has a material financial interest. In addition, I have no knowledge of any investments that would give the firm a material financial interest on any level, there for there would be no conflict of interest.

(C) On occasion we may invest in the same securities (Mutual funds & ETF's) as its clients. The nature of the investments (Mutual funds & ETF's) that R. Seeger Wealth Management and the shares purchased/sold at no time would affect the transaction or have an adverse effect on the stock market, bond market, and or the client.

On an extremely rare occasion we might recommend buying or sell securities to our clients at or about the same time we buy or sell securities for a personal account. If the client and or our firm decided to buy or sell on our firm's recommendation at no time would it have any adverse effect on the stock market, bond market, and or the client's holdings.

## **Brokerage Practices**

(A)(1) I will suggest Charles Schwab to clients as our custodian, but if they feel more comfortable with another custodian I will gladly use what they chose, if it provides the ability to manage the client's assets in accordance with our philosophy. The reason for Charles Schwab & Co., Inc. is because the commission rates and transaction fees are reasonably low. We conduct our own research and do not rely on research created by a broker dealer. We do not engage in any "soft dollar benefits" on any level.

- (a) We do not direct client brokerage commissions to obtain research or other products and services
- (b) We have no interest in any incentives that a brokerage firm might offer such as research, products, or services.
- (c) We do not charge higher commissions to brokerage firms for "soft dollar benefits"
- (d) We do not discriminate against our clients, they are all treated equally. We do not engage in the disbursement of soft dollar credits, because we are not engaged in this practice.
- (e) We have not received any products, research, or services related to soft dollar transactions
- (f) We did not direct clients to any specific broker.

(2) Our selection of broker dealers has no bearing on any future client referral

- (a) Our only interest is that our clients get a favorable execution
- (b) We do not recommend clients to a specific broker dealer for referrals

(3) Directed Brokerage

My clients do not engage in directed brokerage nor does R. Seeger Wealth Management

(B) At this point in time I do not take place in aggregating orders for any client accounts

### **Review of Accounts**

- (A) Client accounts are reviewed periodically, and meetings are at least once a year. The review of the accounts consists of determining if the asset allocation (equity vs. fixed income) needs to be adjusted to its original percentage set forth in the beginning of the initial investment and consultation. The accounts are reviewed by Richard T. Seeger, President/Owner of R. Seeger Wealth Management.
- (B) All client accounts are reviewed on a periodic basis. Statements are created by Charles Schwab & Co., Inc. monthly. Trade confirmations are generated by activity in the respective account. Most reports concerning investment updates are not written but discussed face to face or over the telephone.

### **Client Referrals and other Compensation**

- (A) I do not have any arrangements with other businesses or companies that could potentially give me an economic benefit for accounts under management. R. Seeger Wealth Management chooses investments based on our own research, we do not rely on any firms to assist in choosing securities. We do not take part in any such arrangements that would warrant us receiving an economic benefit on any level.
- (B) R. Seeger Wealth Management does not compensate or give compensation for referrals. We do not practice any such arrangements

## **Custody**

When it deducts fees directly from client accounts at a selected custodian, R. Seeger Wealth Management 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. There are no SLOA's at this time at R. Seeger Wealth Management. Accordingly, R. Seeger Wealth Management will follow the safeguards specified by the SEC rather than undergo an annual audit.

R. Seeger Wealth Management may also be deemed to have custody over the funds and securities of trust accounts for which it or its related persons serve as trustee.

### **Investment Discretion**

The discretionary authority for managing accounts allows R. Seeger Wealth Management to execute buys/sells at our discretion. We are not permitted nor have access to withdrawal monies from any accounts except for management services. Prior to given discretionary authority on clients' accounts we explain to each prospect and existing client exactly what I am permitted to do; which is execute trades in their respective account and withdrawal management fees.



## **Voting Client Securities**

R. Seeger Wealth Management acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it, or for which it is deemed to have, proxy voting authority. R. Seeger Wealth Management will vote proxies on behalf of a client solely in the best interest of the relevant client. R. Seeger Wealth Management has established general guidelines for voting proxies. R. Seeger Wealth Management may also abstain from voting if, based on factors such as expense or difficulty of exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances may vary, R. Seeger Wealth Management may vote in a manner that is contrary to the general guidelines if it believes that it would be in a client's best interest to do so. If a proxy proposal presents a conflict of interest between R. Seeger Wealth Management and a client, then R. Seeger Wealth Management will disclose the conflict of interest to the client prior to the proxy vote and, if participating in the vote, will vote in accordance with the client's wishes.

Clients may obtain a complete copy of the proxy voting policies and procedures by contacting R. Seeger Wealth Management in writing and requesting such information. Each client may also request, by contacting R. Seeger Wealth Management in writing, information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the relevant client during the prior annual period. Clients can send written requests to the Chief Compliance Officer at [RichardSeeger@rswmltd.com](mailto:RichardSeeger@rswmltd.com).

### **Financial Information**

- (A) R. Seeger Wealth Management does not require or solicit prepayment for any client arrangement.
- (B) We do not require prepayment on any level.
- (C) R. Seeger Wealth Management and its only member, Richard T. Seeger has not been the subject of a bankruptcy petition at any time during the past ten years.

## **Education & Material Events**

(A) Education and Business Background:

Richard T. Seeger, President, R. Seeger Wealth Management, LTD  
CERTIFIED FINANCIAL PLANNER TM 2009  
Manhattan College, master's Degree in finance, 1998  
Florida Atlantic University, B.A. (Under Graduate) Degree in Business Mgmt., 1992  
Nassau Community College, Associate Degree in Business Mgmt., 1989  
Certifications/Licenses, NY/FL Life & Health  
Fidelity Investments 1994-2009, Private Client Group, Vice President, Senior Account Executive

(B) I am currently not engaged in any other business at this time, besides the business of investment advice

(C) We do not take part in compensation for advisory services with performance-based fees.

R. Seeger Wealth Management, nor Richard T. Seeger has NOT been liable in a civil or arbitration claim in reference to damages that exceed \$2,500 or involving a self-regulatory organization.