

Investment Adviser Brochure Part 2A

**Seek First Inc.**

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This brochure provides information about the qualifications and business practices of Seek First Inc. If you have any questions about the contents of this brochure, please contact us at (866) 398-4044.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Seek First Inc., also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The use of the term registered investment adviser does not imply a certain level of skill or training.

**August 3, 2023**

## **Item 2 – Material Changes**

There have been no material changes to the brochure since the last amendment. The Brochure will be amended anytime there is a material change and this section will include a summary of any material changes.

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## **Item 4 – Advisory Business**

Seek First Inc. (“the Adviser”) became registered as an investment adviser in 2021. Scott Pearing is the principal owner.

The Adviser has a fixed fee program called Seek First Consulting. The program bundles financial planning, tax planning, estate planning, and insurance planning services.

### **Seek First Consulting**

The Adviser provides consulting and planning services to clients and coordinates the monthly activities and deliverables of a team of other professionals. The team members are chosen based on their accounting, legal, and insurance backgrounds, services being offered, compensation, and their firm governance.

The Adviser first obtains and organizes information from clients and then assists clients with formalizing, setting realistic goals, and tailoring the advisory services based on the individual needs of the client. The Adviser also creates implementation plans based on the recommendations of the professional team. The Adviser reviews overall allocations for suitability and alignment with client objectives, makes adjustments when client circumstances change, and coordinates the efforts of the professional team.

#### *Financial Planning Strategy*

The Adviser assists clients with determining how much to keep in and the adequacy of their cash reserves. This cash flow assessment involves analyzing income and expenses. This generates recommendations regarding reducing debt on an optimized schedule, and modeling the tax consequences of adding to or reducing debt.

The Adviser makes recommendations regarding efficient ways of reaching each goal that may include but isn’t limited to taxes, giving, investing and spending. The Adviser will recommend the ideal account type and strategic and tactical use of assets above the cash reserve amount.

#### *Tax Strategy*

Our firm offers a comprehensive range of tax services to help individuals and businesses navigate taxation efficiently and effectively. We strive to provide tailored solutions that maximize tax benefits and minimize liabilities. Our areas of focus are the following:

- Individual Tax Planning and Preparation
- Business Tax Planning and Compliance
- Corporate Tax Returns
- Tax Consulting
- Tax Compliance review
- Tax Resolution Representation

### *Legal Strategy*

The Adviser will ensure that clients review their estate plans during every annual meeting with the Adviser. The Adviser verifies that an estate planning attorney has reviewed the estate plan (when any underlying information has changed). The estate plan components typically include but are not limited to trusts, wills, healthcare directives, and Powers of Attorney.

The Adviser confirms that the attorney has established a regular schedule for conducting reviews. The Adviser ensures that the various estate planning vehicles were discussed.

### *Insurance Strategy*

The Adviser generally discusses insurance types and coverage needs covering life, disability, Long Term Care, auto, property, earthquake, renter's, liability, health, dental, vision, and identity theft insurance. Related employee benefits packages are reviewed.

### *Annual Meeting*

The Adviser will also update any pertinent information during each annual meeting and determine if goals are on track or have changed.

*Note:* The term for any of the noted financial planning services will be completed within a year or less and that any further reviews may be performed in another contractual engagement with the client.

### **Select Services**

The fixed fee program isn't suitable for every client. The Adviser will recommend an appropriate mix of services that are consistent with the needs, financial and tax status, risk tolerance, and investment objectives of this type of client under these circumstances.

### **Planning Conflicts of Interest**

Since the compensation that is payable to professionals will vary, the Adviser may have an incentive to recommend one professional over another. However, clients are under no obligation to act upon any recommendations of the Adviser or to execute any transactions through any recommended company if they decide to follow the recommendations. The Adviser does not have an arrangement under which it or its associated persons receive compensation from others for client referrals.

A conflict exists between the interests of the investment adviser and the interests of the client, the client is under no obligation to act upon the investment adviser's recommendation, and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

## **Investment Management Services**

The Adviser provides individual investment management services on a discretionary basis to clients who do not wish to participate in the fixed fee program. When the Adviser manages client assets on a discretionary basis, the Adviser executes securities transactions for clients without having to obtain specific client consent prior to each transaction. Discretionary authority is limited to investments within a client's managed accounts. However, clients may impose restrictions on investing in certain securities or types of securities.

The Adviser provides investment management services that include, among other things, advice regarding asset allocation and the selection of investments, portfolio design, investment plan implementation and ongoing investment monitoring. The Adviser relies on the stated objectives of each client and considers the client's risk profile and financial status prior to making any recommendations. The Adviser doesn't participate in wrap fee programs by providing portfolio management or any other services.

The Adviser will collect and document information from each client that forms the basis of and supports all recommendations and tailor the advisory services based on the individual needs of the client. The Adviser will obtain the following information from clients:

- A. Age (or date of birth);
- B. Annual income;
- C. Total net worth (excluding primary residence);
- D. Liquid net worth;
- E. Employment status (if retired, former profession. If self-employed, type of business);
- F. Fair market value of primary residence (and outstanding debt);
- G. Tax status, which includes, type of account (natural person, entity, IRA, etc.), tax bracket, or tax strategy for the account(s);
- H. Investment objectives (should be defined to ensure client understanding);
- I. Investment experience (time/investment products);
- J. Investment time horizon;
- K. Liquidity (cash flow) needs;
- L. Risk tolerance;
- M. Other investments (types of investments held elsewhere);
- N. Any other information the client may disclose to the investment adviser in connection with recommendations or investment advice; and
- O. Any other relevant information the investment adviser should ask based on the investment adviser's strategy (for example, source of funds for the purpose of investment).

The Adviser will make reasonable efforts to document and annually update client suitability information.

As of 08/01/2023, the Adviser manages \$111,000,000 in client assets on a discretionary basis and \$0 on a nondiscretionary basis.

## **Advisory Referral Services**

The Adviser may allocate client assets to Expand Financial Group, LLC, CRD# 293160 a third-party asset manager (independent investment adviser). The Adviser gathers information about a client's financial and tax status and investment objectives. The Adviser allocates assets to Expand Financial Group, LLC based on the investment objectives, consulting and investment management service needs of a client.

Expand Financial Group, LLC creates portfolios consisting of individual stocks, bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments.

## **Conflicts of Interest**

All material conflicts of interest under CCR Section 260.238 are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice, are disclosed within this brochure.

## **Item 5 – Fees and Compensation**

### **Seek First Consulting Fees**

The Adviser charges clients with basic needs a fixed fee of \$2,500 per month payable in arrears for the fixed fee program. Clients with more complex financial planning, tax planning, insurance, and estate planning needs, or are owners of rental properties, multi-generational trusts, and similar circumstances are charged a fee of \$3,000 payable in arrears. The program is designed to provide approximately 12 hours of total time per client per month in addition to various deliverables. The Adviser uses a rate of \$225 an hour to calculate the service component.

Independent professionals in the areas of financial planning, tax planning, insurance, and estate planning are retained as part of the fixed fee program. The Adviser has agreements with each professional. Certain fees for professional services and deliverables are payable from the fixed fee (the \$225 rate serves as a cap). If no service is provided to the client, no fees will be charged during that month. The client will only be charged for the time when an actual service was performed during a month. Program fixed fees are not negotiable. Financial planning fees will be offset for related advisory services of assets being managed by the Adviser.

The following services are outside the scope of the fixed fee program services and will be quoted in writing and agreed to in advance of any work (will incur a separate fee):

- The filing of all tax returns: Federal & States
- Restatement/Creation of any legal documents: Trust, Will, Healthcare Directive & Power of Attorney
- New entity formation: LLCs, Corporations, Partnerships, etc.
- New legal contracts: lease agreements, buy/sell agreements, etc.

- Business deliverables, including bookkeeping & payroll services
- Deliverables for others: family, friends, etc.
- Tax returns & Filings

Clients will have a period of five (5) business days from the date of signing a consulting services agreement to unconditionally rescind the agreement without penalty and receive a full refund of all fees. Thereafter, either party may terminate the agreement with a 30-day notice by phone or email.

Since fees are payable only after services are provided, there are no unearned fees and the client will not have a refund due upon early termination of the agreement. Fees will be charged for the actual time spent providing services. The Adviser will deliver completed portions of any documents to the client.

### *Select Services*

The Adviser charges clients a non-negotiable hourly rate of \$225 for select financial planning and consulting services. Hourly fees are payable monthly in arrears after services are provided.

Clients will have a period of five (5) business days from the date of signing a select services agreement to unconditionally rescind the agreement without penalty and receive a full refund of all fees.

Either party may terminate the select services agreement prior to delivery of any plan or completion of any services by phone or email. The Adviser will prorate fees to the date of termination prior to delivery of any plan or completion of any services for select services clients. Fees will be charged for the actual time providing services. The Adviser will deliver completed portions of any documents to the client.

### **Investment Management Fees**

The Adviser charges clients a fixed fee of \$1,000 per month payable in arrears for investment management services. Direct debits from investment management accounts and checks are acceptable forms of payments. Fees are non-negotiable. Fees are due on the first day of the calendar month for the prior calendar month. The Adviser will prorate management fees based upon the number of days the account was open during the billing period.

The value of the securities contained in the client's managed account shall be deemed to be the closing price of such securities on the leading exchange to which each is admitted to trading. If any such securities are not admitted to trading on an exchange, then the value of such securities shall be deemed to be the closing bid prices in the Over-the-counter market as furnished by the National Quotation Bureau, Inc.

The account custodian may charge fees, which are in addition to and separate from advisory fees. Accounts may incur transaction costs, retirement plan administration fees, mutual fund annual expenses and other fees. Clients should note that fees for comparable



services vary and lower or higher fees may be charged by different providers for similar services. Fees may be higher than normally charged in the industry and that similar services may be offered by another investment adviser at a lower fee.

Clients will have a period of five (5) business days from the date of signing an investment management agreement to unconditionally rescind the agreement without penalty and receive a full refund of all fees. Thereafter, either party may terminate the investment management services agreement with a 30-day notice by phone or email. Since fees are payable only after services are provided, there are no unearned fees and the client will not have a refund due upon early termination of the advisory agreement. However, the Adviser will prorate fees to the date of termination. Fees will be prorated based upon the number of days the account was open during the billing period.

### **Advisory Referral Fees**

The Adviser will pay Expand Financial Group, LLC, \$125 per month of the investment management fee to manage the client assets that are allocated to Expand Financial Group, LLC. Refer to the investment management fees section above for additional details about fees.

### **Receipt of Additional Compensation**

Neither the Adviser nor any supervised person is associated with any broker dealer or accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### **Billing**

In all instances, the Adviser will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and if applicable, the amount of assets under management on which the fee was based, and the name of the custodian(s). The Adviser will send these to the client concurrent with the request for payment or payment of the Adviser's advisory fees. We urge the client to compare this information with the fees listed in the account statement.

Direct debits from investment management accounts and checks are acceptable forms of payments.

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

The Adviser does not charge or receive, directly or indirectly, any performance-based fees. The Adviser shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of the client except as permitted under applicable laws.

## **Item 7 – Types of Clients**

The Adviser provides advisory services to:

- Individuals – Trusts, estates, 401(k) plans and IRAs of a household count as one individual.
- High net worth individuals – Individuals who are “qualified clients” under rule 205-3 of the Advisers Act of 1940 or “qualified purchasers”.
- Business entities including sole proprietorships
- Other Investment Advisers

### **Account Minimums**

The ideal fixed program client has a liquid net worth of \$1.5 million and complex planning and other needs. The Adviser typically requires a minimum of \$500,000 to establish a new advisory account. However, the minimum may be waived at the sole discretion of the Adviser. In addition, the Adviser may continue to service existing accounts that have values that are below the minimum.

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

The Adviser will make reasonable efforts to document and annually update client suitability information.

### **Method of Analysis**

The Adviser’s main sources of financial information are prospectuses, research materials prepared by others, corporate rating services, annual reports and company press releases. The Adviser may utilize official statements, continuing disclosures and other information.

#### *Fundamental Analysis*

The Adviser uses fundamental analysis. Fundamental analysis involves predicting the price movement of an asset based on measures that are related to the underlying business. This method is used to judge the performance of management. (Although it is important to note that things outside of management’s control can impact performance.) Comparing the margins of the company and its relative performance to that of two or three of its peers will give an idea of whether the performance is potentially outside of management’s control.

The Adviser may recommend one or a combination of assets and investment strategies as follows:

## **Mutual and Exchange Traded Funds**

The Adviser recommends index and actively managed, mutual and exchange traded funds when designing client portfolios. The Adviser considers index funds based on how closely the funds' characteristics mirror the indices they track. The Adviser analyzes actively managed funds by comparing funds that target the same market sector and have the same investment style using prospectuses and other sources of information. The Adviser reviews the following prior to recommending funds to clients:

- Rank in Category over various periods
- Return Rating
- Risk Rating
- YTD Return (Outsize swings in comparisons to peers can be a sign of risky practices such as placing large bets on certain sectors of the market.)
- 1 Yr. Return
- 3 Yr. Return
- 5 Yr. Return (Typically over a five-year period, the economy experiences a complete cycle. However, the way in which a manager operates in various economic environments reflects the manager's ability to make adjustments or stay the course.)
- Loads
- Total Expense Ratios
- Net Assets
- Turnover
- Median Market Capitalization
- Fund Rating

The Adviser also takes the manager or management team tenure under consideration to determine who was responsible for generating the performance numbers.

## **Public Equity**

A corporation may issue stock to the general public after registration. Stock represents an ownership interest in a company. The Adviser uses valuation measures and financial information, evaluates the regulatory environment, analyzes products or services that are available or under development and the factors that can impact the price movement of a company's stock. The Adviser also makes comparisons to the company's peers and to the broader market.

## **Corporate Debt & Municipal Securities**

The Adviser generally analyzes the current yield, yield to maturity, yield to call, call and default risks, and interest coverage. Debt is issued by federal, state and foreign governments and corporations to finance their operations. Debt represents their promise to repay the borrowed amount with interest according to the terms and conditions of the debt instrument. Debt obligations offer limited participation in the upside potential of a business. In exchange holders receive interest and a position that is generally senior to equity in a bankruptcy.

## **Investment Strategies**

### *Strategic Asset Allocation*

The client and the Adviser will establish a “base policy mix”, which is the proportion of the client’s portfolio to be allocated for each asset class (stocks, bonds, funds, etc.) based on expected rates of return for each asset class. Strategic Asset Allocation is a buy-and-hold strategy that applies even if there is a shift in the values of the assets that causes a drift from the initially established asset mix.

### **Risk of Loss**

Clients are advised that investing in securities involves the risk of loss of the entire principal amount invested including any gains.

Clients should not invest unless they are able to bear this risk.

Any of the above investment strategies may lead to a loss on investments. Even hedging strategies may fail if markets move against the hedged investments. In addition, investing carries opportunity risks, it is impossible to accurately predict the sectors of the market or asset classes that will have more favorable returns for a given period.

### **Item 8.A – Frequent Trading of Securities**

The Adviser is not involved in the frequent trading of securities.

### **Item 8.B – Material Risks of Particular Securities**

The Adviser doesn’t recommend a type of security that involves significant or unusual risks.

## **Item 9 – Disciplinary Information**

The Adviser does not have any disciplinary information to disclose.

### **Item 9.A – Criminal or Civil Actions**

Neither the Adviser nor any management person has been found guilty of or has any criminal or civil actions pending in a domestic, foreign or military court.

### **Item 9.B – Administrative Proceedings**

Neither the Adviser nor any management person has any administrative proceedings pending before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

## **Item 9.C – Self-Regulatory Organization (“SRO”) Proceedings**

Neither the Adviser nor any management person have been found by any SRO to have caused an investment-related business to lose its authorization to do business, or to have been involved in violating the SRO’s rules, or were barred or suspended from membership or from associating with other members, or were expelled from membership, otherwise significantly limited from investment-related activities, or fined.

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

### **Item 10.A – Broker-Dealer Registration**

Neither the Adviser nor its management persons is or owns a securities broker-dealer or has an application for registration pending. No associated person of the Adviser is a registered representative of a broker-dealer.

### **Item 10.B – Futures Commission Merchant/Commodities**

Neither the Adviser nor any management person is a commodity broker/futures commission merchant, a commodity pool operator, commodity trading advisor or an associated person for the foregoing entities; nor do they have any registration applications pending.

### **Item 10.C – Relationships with Related Persons**

The Adviser will contract with certain third parties providing insurance, tax, and legal services (and may contract with financial planning service providers) through the fixed fee program. This allows for the allocation of investment related and noninvestment related income respectively generally based on the time involved in providing the services. Fees for these services are included in the fixed fee and do not generate a separate fee or increase the fee.

Scott J. Pearring is an insurance agent appointed with various insurance companies to receive trail commissions but will not write new policies. Mr. Pearring has an inactive insurance license. The Program related insurance planning services do not generate a separate fee or increase the fee. However, clients will pay fees such as insurance commissions if insurance products are purchased through an insurance agent.

### **Item 10.D – Relationships with Other Advisers**

The Adviser may recommend but does not select other advisers for its clients. Neither the Adviser nor any of its management persons have any other material relationships or conflicts of interest with any related financial industry participants other than those discussed in Items 4, 5 and 10.C above.

## **Conflicts of Interest**

Since the compensation that is payable to providers of financial planning, insurance, tax, and legal services may vary, the Adviser may have an incentive to recommend one entity providing the same services over another. However, clients are under no obligation to act upon any recommendations of the Adviser and can elect to use any vetted providers of financial planning, insurance, tax, and legal services.

Clients have the option to purchase investment products that the Adviser recommends through other brokers or agents that are not affiliated with the Adviser or investment adviser representatives.

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

### **Item 11.A – Code of Ethics**

The Adviser has adopted a Code of Ethics that sets forth standards of conduct expected of advisory personnel and to address conflicts that arise from personal trading by advisory personnel. Advisory personnel are obligated to adhere to the Code of Ethics, and applicable securities and other laws. The Adviser and related persons do not trade ahead of clients.

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

### **Item 11.B – Participation or Interest in Client Transactions**

#### **Principal Trading**

Neither the Adviser nor any affiliated broker-dealer affects securities transactions as principal with the Adviser's clients. Neither the Adviser nor any associated person acting as a principal, buys securities from (or sells securities to) clients, acts as general partner in a partnership in which Adviser solicits client investments, or acts as an investment adviser to an investment company that the Adviser recommends to clients.

#### **Agency-Cross Action Transactions**

Neither the Adviser nor any associated person recommends that clients buy from or sell securities to other clients.

## **Item 11.C – Personal Trading by Associated Persons**

The Adviser recommends that clients invest in various types of assets. The Adviser and its associated persons may invest in the same types of assets. Permitted investments for associated persons are all asset classes. See Item 11.D for information concerning conflicts of interest.

## **Item 11.D – Conflicts of Interest with Personal Trading by Associated Persons**

Associated persons may own an interest in or buy or sell for their own accounts the same securities, which may be recommended to advisory clients. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients and their personal transactions are regularly monitored. The Head of Operations performs quarterly personal trading reviews.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients. Neither the Adviser nor any related person recommends to clients or buys or sells for clients' accounts investments in which the Adviser or related persons has a material financial interest.

## **Item 12 – Brokerage Practices**

### **Item 12.A – Factors in Selecting or Recommending Broker-Dealers**

#### **The Custodian and Brokers We Use**

The Adviser does not maintain custody of your assets. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when instructed by the Adviser.

While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them.

#### **How We Select Brokers/Custodians**

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally
- without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check
- requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange
- traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates,
- other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients

#### **Item 12.A1 – Research and Other Soft Dollar Benefits**

The Adviser receives soft dollar benefits. The term "soft dollars" refers to funds which are generated by client trades being used by the Adviser to purchase products or services (such as research and enhanced brokerage services) from or through the broker-dealers whom the Adviser engages to execute securities transactions.

#### **Item 12.A2 – Brokerage for Client Referrals**

The Adviser does not refer clients to particular broker-dealers in exchange for client referrals from those broker-dealers.

#### **Item 12.A3 – Directed Brokerage**

The Adviser does not recommend or require that clients direct their brokerage business to any particular broker-dealer.

#### **Item 12.B – Trade Aggregation**

Because of the nature of the Adviser's business activities, (financial planning, recommendations to clients to primarily invest in mutual funds, ETFs and limited customized equity allocations), the Adviser typically does not aggregate the purchase or sale of securities for various client accounts. However, the Adviser will aggregate trades whenever it is not possible to fill all client orders. *By not aggregating trades, clients may have increased costs.*

Whenever trade aggregation becomes necessary, the Adviser will do so consistent with its duty to seek best execution. No client will be favored over any other client; each client



that participates in an aggregated order will participate at the average share price for all of the Adviser's transactions in that security on a given business day, with transaction costs shared pro-rata based on each client's participation in the transaction. Before entering an aggregated order, the Adviser will prepare a written statement specifying the participating client accounts and how it intends to allocate the securities purchased among those clients.

If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the written statement. If the order is partially filled, it will be allocated pro-rata based on the written statement.

The Adviser's books and records will separately reflect, for each client account, the orders which are aggregated, the securities held by, and bought and sold for that account.

The Adviser will receive no additional compensation of any kind as a result of the proposed aggregation and individual investment advice and treatment will be accorded to each client.

## **Item 13 – Review of Accounts**

Scott Pearring performs reviews of all investment advisory accounts no less than quarterly. He reviews accounts for consistency with the investment strategy and performance chosen by clients (among other things). Reviews may be triggered by changes in an account holder's personal, tax or financial status. Macroeconomic and company specific events may also trigger reviews. There is currently no limit on the number of accounts that can be reviewed by Scott Pearring.

The Adviser creates an implementation plan for a fixed fee program client based on the recommendations of the client's professional team that may include but isn't limited to firms providing financial planning, tax planning, estate planning, and insurance planning services. The Adviser doesn't provide standardized reports or reporting to managed account clients.

In addition, brokerage statements are generated no less than quarterly and the account custodian sends copies directly to clients. These reports list the account positions, activity in the account over the covered period and other related information. The custodian also sends confirmations following each brokerage account transaction unless confirmations have been waived.

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

The Adviser does not have an arrangement under which it or its associated persons compensate others for client referrals. The Adviser doesn't receive any economic benefit for providing advisory services to clients from a person who is not a client. The Adviser will not receive any economic benefit for client referrals to a third-party investment adviser. Other than existing information in Item 4 and 5 of this brochure, Seek First does not refer clients to a third-party investment adviser for compensation.

## **Item 15 – Custody**

The Adviser doesn't accept custody of client funds or securities. Client assets are held by qualified custodians. Clients are urged to compare the account statements they receive from the qualified custodian with invoices and statements/reports they receive from the Adviser.

### **SLOA Disclosure for Schwab**

The Adviser maintains custody of client funds and/or securities by virtue of having one or more Standing Letters of Authorization ("SLOA") from clients of the Adviser. SLOAs provide investment advisers with the authority to disburse client funds to one or more third parties as specifically designated by the client.

Clients instruct account custodians to accept the Adviser's instructions (on the client's behalf) to move money to third parties designated by the client in the SLOA. The Adviser's authority is strictly limited by the terms of that instruction and the client retains full power to change or revoke the arrangement at any time.

The Adviser maintains SLOAs solely for the purpose of authorizing regular payments of advisory fees to be made from client custodial accounts.

The SEC has determined that under these circumstances, the Adviser retains custody of client assets.

The Adviser will periodically review fund transfer authorizations from client accounts and wire transfer destination information to ensure that transfers conform to the authority granted in the SLOAs.

## **Item 16 – Investment Discretion**

The Adviser will have discretion over the selection of securities and the amount to be bought or sold without obtaining specific client consent.

Prior to assuming discretionary authority, the Adviser and a client will sign an advisory agreement that authorizes discretionary management. Additionally, a client will sign a custodial agreement and a letter of authorization that grants discretionary management authority to the Adviser.

The Adviser will not have discretion over the selection of the broker to be used or the commission rates to be paid.

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

The Adviser does not accept authority to vote proxies on behalf of clients as a matter of policy. Clients will receive their proxy information directly from their custodian or a transfer agent. Clients may contact the Adviser with questions about a particular solicitation by

telephone at (866) 398-4044 or [Scott@SeekFirstInc.com](mailto:Scott@SeekFirstInc.com).

## **Item 18 – Financial Information**

There is no financial condition that is reasonably likely to impair the Adviser's ability to meet its contractual commitments to its clients. The Adviser has not been the subject of a bankruptcy petition at any time during the past ten years. The Adviser doesn't require or solicit prepayment of more than \$500 in fees per client, six months or more in advance of providing services.

The Adviser doesn't have custody so no audited balance sheet is being provided.

## **Item 19 – Requirements for State Registered Advisers**

### **Item 19.A – Management Biographical Information**

Refer to Item 2 and the Part 2B Supplement for management person information.

All material conflicts of interest are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

### **Item 19.B – Outside Business Activities**

Mr. Pearring is receiving insurance trail commissions but will not write new policies. Mr. Pearring has an inactive insurance license. Neither the Adviser nor any management person is involved in any other outside business activities and affiliations.

### **Item 19.C – Performance Based Fees**

Neither the Adviser nor any supervised person of the Adviser is compensated for advisory services with performance-based fees.

### **Item 19.D – Arbitration Claims, Litigation and Other Proceedings**

Neither the Adviser nor any management person has been found liable as a result of any arbitration claim, or civil, self-regulatory organization, or administrative proceeding.

### **Item 19.E – Relationships with Issuers of Securities**

Neither the Adviser nor any management person has any relationship or arrangement with any issuer of securities.