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## Firm Brochure

(Part 2A of Form ADV)

March 2, 2026

This brochure provides information about the qualifications, business practices, and nature of services of Sea Clear Financial Planning, LLC. The contents of this brochure have not been approved or verified by the Securities and Exchange Commission (SEC), or any other state or federal authority. While the firm is an investment adviser registered with the state of New Jersey, such registration does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Additional information about the firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Sea Clear Financial Planning, LLC's CRD number is 160133. If you have any questions about the contents of this brochure, please contact Sea Clear Financial Planning by telephone at (732) 580-8039.

## Item 2: Material Changes

The Material Changes in this brochure, from the last annual amendment dated January 24, 2025, relating to Sea Clear Financial Planning's policies, practices or conflicts of interests, are described below.

### Item 4 – Advisory Business

- The firm now utilizes AssetMark, Inc., a wholly owned subsidiary of AssetMark Financial Holdings, Inc. as a wealth management and technology platform instead of the Morningstar Wealth Platform to implement investment strategies on behalf of clients. Although the Morningstar Wealth Platform was sold to AssetMark, Morningstar Investment Services (“MIS”) will continue to exist as third-party strategist on the AssetMark platform and continue to manage the investment strategies of the transitioned assets.

### Item 5 – Fees and Compensation

- Replaced references to Morningstar Investment Services with AssetMark, Inc.
- Updated the explanation of fees and fee calculations.

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

- Replaced references to Morningstar Investment Services with AssetMark, Inc.

### Item 10: Other Financial Industry Activities and Affiliations

- Updated any material relationships or potential conflicts of interest to reflect the new partnership with AssetMark, Inc.

### Item 12: Brokerage Practices

- Adjusted language to clarify Charles Schwab & Co., Inc. (“Schwab”), a registered broker dealer, member of SIPC, remains the qualified custodian, but AssetMark, Inc. is now responsible for trading and reporting functions, as per the Direct Custodian model.
- Replaced references to Morningstar Investment Services with AssetMark, Inc. to explain how trades are executed, who has discretion, and how soft dollars or best execution is evaluated with AssetMark as the TAMP and incorporated an economic benefit section to explain services the firm may benefit from by using Schwab as the custodian and AssetMark, Inc. as an asset management platform.

### Item 13: Review of Accounts

- Replaced the reference to quarterly performance reporting from MIS to AssetMark, Inc.

### Item 15: Custody

- Clarified AssetMark, Inc. will debit fees and send quarterly invoices, while Schwab remains the custodian.

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## Item 4: Advisory Business

### A. Firm Description

Sea Clear Financial Planning, LLC (“we” or “us” or “firm”), became a New Jersey registered investment adviser in 2012. The firm is owned by Kelly Trageser, MBA, CFP®.

Sea Clear Financial Planning provides comprehensive financial planning and investment management services primarily to individuals and high net worth individuals. The firm’s holistic approach to wealth management encompasses creating a robust financial plan which includes, but is not limited to, a review of financial goals and objectives, a cash flow analysis, insurance reviews, education funding techniques, strategic tax planning, equity compensation planning, retirement planning & estate planning along with portfolio reviews and asset management.

The firm adheres to a fiduciary standard, which means Sea Clear Financial Planning and its associates will act in good faith and in the best interest of its client.

Sea Clear Financial Planning is strictly a fee-only financial planning and investment management firm. This means that the firm will be compensated solely with fees paid by its clients. Sea Clear Financial Planning does not sell any products such as annuities or insurance, receive any commissions, or collect any other type of compensation from third parties. Instead, the Sea Clear Financial Planning bases its fees on hourly charges, fixed fees and/or a percentage of assets under management. (please see Item 5 for a complete discussion of Fees and Compensation).

To begin a relationship with Sea Clear Financial Planning, an initial complimentary meeting, either in person, over the phone or virtually, is conducted by Kelly Trageser, MBA, CFP® with the prospective client, to determine whether financial planning and investment management services may be beneficial to the prospective client. Should the prospective client wish to engage Sea Clear Financial Planning for its services, the prospective client and the firm must enter into a written agreement.

### B. Types of Advisory Services

Comprehensive financial planning is offered as a standalone service or with investment management. *The majority of Sea Clear Financial Planning clients receive comprehensive financial planning and professional investment management of their assets.*

**Comprehensive Financial Planning** includes but is not limited to: a review of financial goals and objectives, a cash flow analysis, insurance reviews, education funding techniques, strategic tax planning, equity compensation planning, portfolio analysis, retirement planning, and estate planning. A written financial plan contains the above stated items along with a summary of the recommendations. The firm assists the client with the summary of recommendations and offers semiannual financial planning and portfolio review meetings.

**Investment Management** includes but is not limited to: identifying a client’s risk tolerance; creating an investment policy statement; transferring and liquidating the current investment portfolio, implementing the recommended portfolio; rebalancing to the asset allocation and ongoing monitoring of the investment portfolio.

Sea Clear Financial Planning offers investment management services through AssetMark, Inc. (“AssetMark”). AssetMark provides a platform to implement investment strategies on behalf of clients. AssetMark provides access to a curated menu of institutional-quality portfolios, sub-advised by independent third-party strategists. Portfolio selection is based on each client’s financial goals, risk profile, and time horizon. Our firm works closely with AssetMark and its strategists to recommend and monitor portfolios that align with client objectives.

**Retirement Plan Advisement** includes but is not limited to: providing recommendations for asset allocations, selecting holdings, and monitoring the performance of assets held in current employer sponsored retirement plans such as 401(K)s, 403(B)s, and 457 Plans. Those assets remain at the current place of business while the Client is still employed. Sea Clear Financial Planning shall not take into consideration any of the Client's other investment holdings when making its recommendations. It shall remain solely up to the Client to determine whether Sea Clear Financial Planning's recommendations are suitable given the Client's total investment holdings. Because the firm is being requested to provide consulting the Client acknowledges that the firm's recommendations shall be limited to the investment options provided by the retirement plan. No portion of this retirement plan service includes implementation services. Rather it remains the Client's exclusive responsibility to accept/reject or implement any of the firm's recommendations or advice.

#### **Limited Scope Engagements**

Sea Clear Financial Planning provides hourly financial planning services for clients who need advice on a limited scope of work. Comprehensive financial plans cannot be completed through an hourly engagement. The scope of each hourly engagement is determined solely by the client.

Sea Clear Financial Planning does not provide accounting, legal or property and casualty insurance advice. In the event that the financial plan calls for another professional to be engaged, such as an attorney, accountant or insurance agent, the client will engage that professional directly. If Sea Clear Financial Planning, recommends a particular professional to the client, the client is under no obligation to engage that professional. The client should be aware that the other professionals may bill them separately for their services.

#### **Written Acknowledgement of Fiduciary Status**

When the firm provides investment advice to a client regarding their retirement plan account or individual retirement account, the firm acts as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way the firm is compensated creates some conflicts with the client's interests, so the firm operates under a special rule that requires the firm to act in the client's best interest and not put the firm's interest ahead of its clients. Under this special rule's provisions, the firm must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

#### **C. Client Tailored Advisory Services and Client Imposed Restrictions**

Sea Clear Financial Planning tailors their advisory services to the individual needs of clients as described above in Section 4B. Clients may impose restrictions on investing in certain securities or types of securities.

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

Sea Clear Financial Planning offers investment management services through AssetMark, Inc. ("AssetMark") and its wrap fee program. Clients are charged one fee which includes: the AssetMark platform fee, the sub-advisory (strategist) fee and Sea Clear Financial Planning's fee. See Item 5: Fees and Compensation for further discussion. The wrap fee program bundles various services together and charges an all-inclusive fee, named a "wrap fee" because it wraps around all services rather than charging a separate fee for each service. A description of the AssetMark platform practices, fees and conflicts will be disclosed in AssetMark's Appendix 1 of Form ADV 2A that will be provided to clients prior to or at the time of entering into an agreement with AssetMark and Sea Clear Financial Planning.

**E. Assets Under Management**

As of December 31, 2025, Sea Clear Financial Planning managed approximately \$67,782,000 of assets under management on a discretionary basis and \$2,095,000 of assets under advisement.

**Item 5: Fees and Compensation**

**A. Description of Fees**

The client shall pay Sea Clear Financial Planning a one-time initial engagement fee of \$5,000.00 for the development and presentation of a customized financial plan. Sea Clear Financial Planning reserves the right to negotiate different fee amounts for different client circumstances. The fee is calculated based on Sea Clear Financial’s hourly rate of \$250.00 as well as the anticipated complexity of reviewing and analyzing the client’s financial circumstances. The client agrees to pay a \$500.00 deposit upon signing and returning the Agreement to us. The balance will be due and payable to Sea Clear Financial Planning immediately upon presentation of the recommendations. In the event the client terminates the Agreement, any unearned fees will be returned to the client on a pro rata basis. Since a great deal of work will have gone into creating a financial plan, once it is presented and the recommendations are received, the initial engagement fee is not refundable. The fees are negotiable.

Following the delivery of the initial financial plan, if the client chooses to implement the investment recommendations using AssetMark’s platform, the client will be part of the AssetMark Wrap Fee Program, which includes the AssetMark platform fee, sub-advisory (strategist) fee and Sea Clear Financial Planning’s Advisory fee. The total fee charged to the client depends on the sub-advisor (strategist) and investment solution(s) selected from the AssetMark platform. The initial engagement fee is not credited towards the AssetMark Wrap Fee and the client has no obligation to implement the recommendations. If the client does not transition to investment management, financial planning will continue for one year from the time the agreement was signed.

Sea Clear Financial Planning’s portion of the fee is listed in the below fee schedule. Sea Clear Financial Planning reserves the right to modify its fee schedule upon thirty (30) days prior written notice to the client.

<b>Assets Under Management</b>	<b>Advisory Fee (Annual)</b>
First \$500,000 to \$2,000,000	1.00%
Next \$2,000,001 to \$5,000,000	0.90%
Next 5,000,001 to \$10,000,000	0.70%
Next \$10,000,001 +	0.50%

Annual fees are billed quarterly in advance and are based on the prior quarter’s ending balance. Fees are calculated and debited directly by AssetMark. The client must consent in advance to direct debiting of the Wrap Fee from their investment account(s). The final fee amount will appear within the AssetMark Proposal which the client must sign to begin services detailed within this Agreement. The combination of fees for Sea Clear Financial Planning, AssetMark and the sub-advisor (strategist) will not exceed 1.75% annually. The fees charged are negotiable and will not exceed any limit imposed by any regulatory agency.

Retirement Plan Asset Advisement follows the above fee schedule. The Retirement Plan Asset Advisement fee is billed quarterly in advance and is based on the ending market value of the retirement plan (i.e. 401K, 403b) account on the last business day of the prior calendar quarter. The fee is calculated by the firm and submitted to Charles Schwab to be deducted from an account established at Charles Schwab. Clients are required to open an investment account at Charles Schwab & Co. Inc. and establish an AssetMark portfolio recommended by the firm in order to facilitate billing for this service. Fees for this service are separate from the AssetMark Wrap Fee.

**B. Limited Scope Financial Planning**

For limited scope engagements, the fee is calculated based on Sea Clear Financial’s hourly rate of \$250.00. The full balance is due upon presentation of the work completed.

**C. Third Party Fees**

Clients are responsible for all third-party fees, including custodian transaction fees and internal fund expenses include 12b-1 fees (and other mutual fund expenses) which are separate from the AssetMark Wrap Fee.

**D. Termination Of Services And The Return of Fees**

Sea Clear Financial Planning and its clients may terminate any of the aforementioned agreements at any time by notifying the other party in writing. A pro rata portion of any prepaid, unearned fees will be promptly returned. Since a great deal of work will have gone into creating a financial plan, once it is presented and the recommendations are received, the initial engagement fee is not refundable. Clients using the firm’s investment management services, will obtain a refund of a pre-paid fee, based on the number of remaining days in the quarter, if the advisory contract is terminated before the end of the billing period.

**E. Compensation For The Sale Of Securities**

Neither Sea Clear Financial Planning nor the firm’s Principal accepts any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

**Item 6: Performance-Based Fees**

The firm does not charge performance-based fees, which are fees based upon a share of capital gains or capital appreciation of the managed funds.

**Item 7: Types of Clients**

Sea Clear Financial Planning provides its services primarily to individuals and high net worth individuals. Client relationships vary in terms of scope and length of service. The firm also reserves the right to decline services to any prospective client for any reason. The firm has a \$500,000 minimum value of assets for investment management. This minimum value of assets may be waived by the firm on a case by case basis.

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

**A. Methods of Analysis**

Sea Clear Financial Planning uses portfolios and strategies made available through the AssetMark platform. AssetMark and its sub-advisors, also known as strategists, may employ various investment methodologies, including fundamental and technical analysis, modern portfolio theory, and tactical allocation strategies. The following items describe the methods of analysis used with respect to the securities and investment options made available through AssetMark’s Wrap Fee Program when providing investment advice to clients:

**Fundamental Analysis:** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical Analysis:** involves the analysis of past market data; primarily price and volume.

**Charting Analysis:** involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

**Quantitative Analysis:** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Modern Portfolio Theory:** is an investment approach 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, by carefully choosing the proportions of various assets.

## **B. Investment Strategies**

Sea Clear Financial Planning implements investment strategies based on a client's financial goals, risk tolerance and time horizon. The cornerstone of Sea Clear Financial Planning's investment philosophy is grounded in the below core beliefs.

**Risk Tolerance:** we believe clients should understand investing in equities, bonds, mutual funds, etc. involve risks and there is always the chance of loss with any investment. We believe the reward for equity exposure increases over time and the risk of equity exposure decreases over time.

**Asset Allocation & Diversification:** we believe, over time, asset allocation and diversification within portfolios reduces risk and optimizes favorable returns.

**Portfolio Performance:** we do not believe in chasing performance returns. We believe in preserving and growing wealth over time.

**Time Horizon:** we believe in the importance of time. We believe funds for short term goals i.e. one to three years, should be kept in cash or vehicles such as money market funds, while funds for longer term goals such as retirement should be invested. We do not believe in trying to "time the market" in order to reduce losses by going to cash. Since market volatility is to be expected, we believe in staying the course, when a well thought out portfolio has been constructed to meet a financial goal.

**Mitigation of Taxes:** we believe tax planning should be an integral part of portfolio management. We believe the implications of withdrawals from tax deferred, taxable and tax-free accounts should be reviewed with clients and their tax professional ahead of time.

**Portfolio Analysis & Review:** we believe in regular reviews with clients. We offer semiannual comprehensive financial planning and portfolio review meetings to review any changes in financial circumstances, goals or investment objectives. We have found commitment to these meetings significantly reduces short term market concerns and increases the chances of clients staying the course to meet their financial goals.

## **C. Risk of Loss**

Investing in securities involves risk of loss that clients should be prepared to bear. The firm does not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance. All investments carry a risk of loss.

Investors Face The Following Risks When Making Any Investment:

**Inflation & Interest Rate Risk:** Security prices and portfolio returns will likely vary in response to changes in

inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

**Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

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

**Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

**Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. The risk is being unable to sell an investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price, or it may not be possible to sell the investment at all. For example, Treasury Bills are highly liquid, while real estate properties are not liquid.

**Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

**Transition Risk:** As assets are transitioned from a client's prior adviser to Sea Clear Financial Planning, LLC there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Sea Clear Financial Planning, LLC. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Sea Clear Financial Planning, LLC may adversely affect the client's account values, as Sea Clear Financial Planning, LLC's recommendations may not be able to be fully implemented.

#### Investors Face The Following Risks of Third-Party Asset Management:

**Third-Party Asset Management:** Sea Clear Financial Planning selected AssetMark because the firm believes AssetMark demonstrates the highest level of integrity. Sea Clear Financial Planning's selection process cannot ensure that AssetMark will perform as desired and Sea Clear Financial Planning will have no control over the day-to-day operations of AssetMark. Sea Clear Financial Planning would not necessarily be aware of certain activities at AssetMark, including without limitation AssetMark's engaging in unreported risks, investment "style drift" or even regulator breach or fraud. In monitoring and analyzing AssetMark, Sea Clear Financial Planning uses benchmarking analysis, assessing whether the sub adviser's performance has met, exceeded, or fallen short of

comparable benchmarks (e.g., Russell 2000, S&P 500, etc.). While Sea Clear Financial Planning believes AssetMark strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, the firm cannot guarantee that an investment objective or planning goal will be achieved. Some investment decisions made by the firm and/or client may result in loss, which may include loss of the original principal invested.

**Model Portfolios:** are designed to capture return and risk at market rates. These portfolios seek to provide clients with diversification benefits to help to smooth returns, reduce volatility and decrease asset-class and single-strategy risks. Risks specific to using model portfolios include the possibility that the model portfolio will underperform the market and the possibility that the model will not be able to take advantage of opportunities that a non-model portfolio management approach might capture. Model portfolios entail inflation (purchasing power) risk, interest rate risk, economic risk, market risk, political/regulatory risk, and asset allocation risk – meaning that any given asset allocation strategy does not guarantee any specific result or profit nor protect against a loss.

### Investors Face The Following Risks of Specific Securities Utilized:

**Equity:** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and 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 market conditions and general economic environments.

**Fixed Income:** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This includes 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 significant 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, but these bonds still carry a risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risks inherent in non-U.S. investing.

**Non-U.S. Securities:** present certain additional 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.

**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 or stock (equity) nature, or a mix of multiple underlying security types.

**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. Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Because ETFs use "authorized participants" (APs) as agents to facilitate creations or redemptions (primary market), there is a risk that an AP decides to no longer participate for a particular ETF; however, that risk is mitigated by the fact that other APs can step in to fill the vacancy of the withdrawing AP [an ETF typically has multiple APs] and ETF transactions predominantly take place in the secondary market without need for an AP. Like other liquid securities, ETF pricing changes throughout the trading day and there can be no guarantee that an ETF is purchased at the optimal time in terms of market movements. Moreover, due to market fluctuations, ETF brokerage costs, differing demand and characteristics of underlying securities, and other factors, the price of an ETF can be lower

that the aggregate market price of its cash and component individual securities (net asset value – NAV). An ETF is subject to the same market risks as those of its underlying individual securities, and also has internal expenses that can lower investment returns.

## **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 Organizations (SRO) Proceedings**

There are no self-regulatory proceedings to report.

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

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

Neither Sea Clear Financial Planning, LLC 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, Commodity Trading Advisor**

Neither Sea Clear Financial Planning, LLC nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

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

Neither Sea Clear Financial Planning, LLC nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

Sea Clear Financial Planning directs clients to AssetMark, a third-party asset management platform, for implementation of investment strategies. Sea Clear Financial Planning has formed relationships with independent, investment advisers to serve as sub-advisors through the AssetMark platform and its wrap fee program. We do not compensate sub-advisors for client referrals, nor do sub-advisors compensate our firm for client referrals. Please refer to the previous disclosures in Item 4 and Item 5 regarding our use of sub-advisors.

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

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

Sea Clear Financial Planning strives to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, nonpublic information about you or your account holdings by persons associated with our firm.

Our 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, Political and Charitable Contributions, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance with firm 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. Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

In addition to the firm's Code of Ethics, Kelly Trageser, MBA, CFP® also adheres to the Certified Financial Planner Board of Standards Code of Ethics:

**Principle 1 – Integrity** - An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors are placed by clients in positions of trust by clients, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

**Principle 2 – Objectivity** - An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgement.

**Principle 3 – Competence** - Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

**Principle 4 – Fairness** - Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

**Principle 5 – Confidentiality** - Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

**Principle 6 – Professionalism** - Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

**Principle 7 – Diligence** - Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

#### **B. Participation or Interest in Client Transactions**

Neither Sea Clear Financial Planning, LLC nor any related person are authorized to recommend to a client, or effect

a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc. Additionally, representatives of Sea Clear Financial Planning are prohibited from taking or providing a loan from a client unless it is an approved financial institution or the natural person is an immediate family member.

**C. Personal Trading of Similar Securities**

Sea Clear Financial Planning does not recommend specific securities to clients and therefore representatives of Sea Clear Financial Planning do not buy or sell securities for themselves that they also recommend to clients. However, Kelly Trageser, MBA, CFP®, the firm’s managing member, does participate in the same portfolio models as clients. Her trades are not entered in advance of client trades and are generally traded together by AssetMark.

**D. Personal Trading and Timing of Securities**

Sea Clear Financial Planning does not trade securities and relies on AssetMark to place the trades within their models and therefore has no control of when personal trades are entered.

**Item 12: Brokerage Practices**

**A. Factors Used To Select Custodians and / or Broker Dealers**

Sea Clear Financial Planning recommends that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker dealer, member of SIPC, as a qualified custodian. Schwab provides custody services for client assets. Sea Clear Financial Planning directs clients to AssetMark, a third-party asset management platform, for implementation of investment strategies. AssetMark facilitates trading, reporting, billing, and access to third-party investment strategists. Schwab and AssetMark operate independently of one another and of Sea Clear Financial Planning.

**Best Execution**

Sea Clear Financial Planning recommends a custodian/broker that will hold client assets and execute transactions. When considering whether the services Charles Schwab & Co., Inc. (“Schwab”), provides are, overall, most advantageous to clients when compared with other available providers, the firm considers a wide range of factors including: the capability to execute, clear and settle trades (buy and sell securities for your account), facilitate the transfers and payments to and from client accounts, the quality of service, reputation, financial strength, security and stability. For our clients’ accounts that Schwab maintains, Schwab generally does not charge clients separately for custody services but is compensated by charging clients commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (many mutual funds and U.S. exchange traded equities and ETFs) may not incur Schwab commissions or transaction fees. Although our firm is not required to select the broker dealer that charges the lowest transaction cost, even if that broker provides similar quality, we have determined that having Schwab execute trades is consistent with our duty to seek “best execution.”

**Soft Dollars**

Sea Clear Financial Planning does not have any soft dollar arrangements.

**Directed Brokerage**

Sea Clear Financial Planning will require clients to use Charles Schwab & Co., Inc.

**B. Aggregating Trades**

Trading discretion and execution are handled by AssetMark and/or the underlying investment strategists. Sea Clear Financial Planning does not aggregate trades directly.

## **Item 13: Review of Accounts**

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

Financial plans and investments held in client accounts managed by Sea Clear Financial Planning along with portfolios developed by sub advisers on the AssetMark platform are reviewed semiannually, on an as needed basis, or when market conditions dictate by the firm's Principal. Assets not being managed by Sea Clear Financial Planning, are the client's responsibility to monitor and review.

### **B. Triggers for Non-Periodic Reviews**

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).

### **C. Regular Reports**

Clients receive monthly account statements from the custodian, Charles Schwab and quarterly performance reports from AssetMark. Sea Clear Financial Planning reviews reports regularly to ensure investment objectives are maintained and fees are being calculated correctly.

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

### **A. Economic Benefits**

Charles Schwab, our qualified custodian, makes available to Sea Clear Financial Planning products and services that we benefit from but may not benefit your accounts. Some of these other products and services assist us in managing and administering client accounts. These include software and other technology that include but are not limited to:

- Access to client account data (such as trade confirmation and account statements)
- Facilitated trade execution (and allocation of aggregated trade orders for multiple client accounts)
- Research, pricing information and other market data
- Facilitated payment of our fees from client accounts
- Assistance with back-office functions, recordkeeping and client reporting

AssetMark, our wealth management platform, makes available to Sea Clear Financial Planning products and services to help us manage and further develop our business. In addition, AssetMark can make available, arrange and/or pay for these types of services rendered to Sea Clear Financial Planning by independent third parties. These services include but are not limited to:

- Consulting, publications and conferences on practice management
- Technology solutions
- Business consulting and support
- Regulatory compliance
- Marketing support

Our requirement, that you maintain your assets in accounts at a qualified custodian or on a wealth management platform, is based in part on the benefit to us of the availability of these products and services and not solely on the nature, cost or quality of the platform and brokerage services. This presents a conflict of interest because we are incentivized to increase the amount of assets managed in order to receive and/or increase these benefits. However, as a fiduciary, we endeavor to act in your best interest.

### **B. Compensation for Client Referrals**

Sea Clear Financial Planning is strictly a fee-only financial planning and investment management firm. This means

that the firm will be compensated solely with fees paid by its clients. Sea Clear Financial Planning does not sell any products such as annuities or insurance, receive any commissions, or collect any other type of compensation or referral fee from third parties. The firm does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

**Item 15: Custody**

AssetMark calculates and deducts advisory fees directly from client accounts held at Schwab, and provides quarterly billing disclosures. Sea Clear Financial Planning does not hold custody of client funds or securities beyond the limited authority to deduct fees. Clients are encouraged to review all Schwab statements and AssetMark reports and notify the firm of any discrepancies.

**Item 16: Investment Discretion**

Sea Clear Financial Planning provides discretionary advisory services to its clients. The Comprehensive Financial Planning and Investment Management Agreement established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, the firm manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought or sold, or the price per share. Sea Clear Financial Planning will also have discretionary authority to determine the broker dealer to be used for a purchase or sale of securities for a client's account.

**Item 17: Voting Client Securities**

The firm will not vote proxies on your behalf. Clients are responsible for voting proxies related to their investments.

**Item 18: Financial Information**

There are no material financial circumstances or conditions that would reasonably be expected to impair the firm's ability to meet its contractual obligations to its clients. The firm does not serve as a custodian for client accounts and does not require or solicit prepayment of more than \$500 per client, six months or more in advance. Therefore, a balance sheet is not required with this brochure. Sea Clear Financial Planning has not been the subject of a bankruptcy petition in the last ten years.

**Item 19: Requirements for State Registered Advisors**

**A. Principal Officers**

Sea Clear Financial Planning currently has only one management person/executive officer: Kelly Trageser, MBA, CFP®. Her education and business background can be found on the Form ADV Part 2B brochure supplement.

**B. Other Businesses**

Sea Clear Financial Planning, LLC and its managing member is not involved in any other businesses.

**C. Performance Based Fees**

Sea Clear Financial Planning, LLC will not collect performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Disclosure Events**

No management person of Sea Clear Financial Planning, LLC has been involved in any disclosure events.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.

Item 1:



# Sea Clear Financial Planning, LLC

## Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Kelly Trageser, MBA, CFP®**

Personal CRD Number: 3078771

Investment Adviser Representative

This brochure supplement provides information about Kelly Trageser, MBA, CFP® that supplements the Sea Clear Financial Planning, LLC brochure. You should have received a copy of that brochure. Please contact Kelly Trageser, MBA, CFP® Principal and Chief Compliance Officer if you did not receive it or if you have any questions about the contents of this supplement. Additional information about Kelly Trageser, MBA, CFP® is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Educational Background and Business Experience**

Kelly Trageser, MBA, CFP® - Managing Member / Firm Principal / CFP™ / Investment Adviser Representative  
Born: 1970

**Education**

Certificate in Financial Planning, Fairleigh Dickinson University, Madison, NJ, March 2010  
MBA in Finance, Pace University, New York, NY, May 1998  
Bachelor of Arts in Economics, Bucknell University, Lewisburg, PA, Dec. 1993

**Business Experience**

Principal, Sea Clear Financial Planning, LLC, Brielle, NJ (2012-Present)  
Associate Financial Planner, Aznar Financial Advisors, Morris Plains, NJ (2009-2011)  
Senior Credit Analyst, GE Capital Solutions, Inc. Matawan, NJ (2001-2008)  
Credit Analyst, Nomura Securities International, New York, NY (1998-2001)  
Traders Assistant, Mitsui and Co., USA, Inc. New York, NY (1993-1998)

**Professional Designations**

Kelly Trageser, MBA is a CERTIFIED FINANCIAL PLANNER™ professional. The CFP® certification is a recognized standard for personal financial planning. Only those who have fulfilled the certification and renewal requirements of the CFP Board can display the CFP® certification marks. Stringent Education, Examination, Experience, and Ethics requirements must be met to maintain the CFP® certification.

**Item 3: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised person providing investment advice. No information is applicable to this Item for Kelly Trageser.

**Item 4: Other Business Activities**

Kelly Trageser, MBA, CFP® is not engaged in any investment-related business or occupation (other than this advisory firm).

**Item 5: Additional Compensation**

Other than salary, Kelly Trageser, MBA, CFP® does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Sea Clear Financial Planning, LLC.

**Item 6: Supervision**

As the Chief Compliance Officer of Sea Clear Financial Planning, LLC, Kelly Trageser, MBA, CFP® supervises all duties and activities of the firm. Kelly Trageser, MBA, CFP®'s contact information is on the cover page of this disclosure document. Kelly Trageser, MBA, CFP® adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

**Item 7: State Requirements**

- A. Kelly Trageser, MBA, CFP® has not been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - an investment or an investment-related business or activity;
    - fraud, false statement(s), or omissions;
    - theft, embezzlement, or other wrongful taking of property;
    - bribery, forgery, counterfeiting, or extortion; or
    - dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - an investment or an investment-related business or activity;
    - fraud, false statement(s), or omissions;
    - theft, embezzlement, or other wrongful taking of property;
    - bribery, forgery, counterfeiting, or extortion; or
    - dishonest, unfair, or unethical practices.
- B. Kelly Trageser, MBA, CFP® has not been the subject of a bankruptcy petition at any time.