

PRIVACY POLICY

In the course of client relationships, Secrest Blakey & Associates, LLC d/b/a Southeast Financial Group (SEFG) gathers and maintains personal, non-public information regarding its clients' financial circumstances and investment objectives. SEFG is committed to maintaining the privacy and confidentiality of the client's information. Accordingly, SEFG has adopted a privacy policy in accordance with SEC and FTC privacy regulation, which require investment advisors to determine and disclose how they treat non-public information about their clients and potential clients.

- A. SEFG may collect non-public personal information about SEFG's clients and potential clients from the following sources:
- Information received from account applications, written questionnaires, interviews/conversations, information forms and other client interactions;
 - Information about transactions with SEFG, any affiliates of SEFG, or others
 - Information SEFG obtains or receives from a consumer-reporting agency.
- B. Advisor personnel are prohibited from sharing or disclosing non-public information regarding any client or potential client of SEFG, except (i) as necessary to service client accounts including, without limitations, the settlement, billing, processing, clearing, or transferring of client transactions; (ii) with broker-dealer firms having regulatory requirements to supervise certain (Advisor's) activities; or (iii) as otherwise directed by a client. Access to all client files and information, whether in paper or electronic format, is limited to advisor personnel for the purposes of servicing client accounts.
- C. Advisor personnel may not remove client files or information from SEFG's premises unless (i) it is necessary to service client accounts; and (ii) prior approval is obtained from the Chief Compliance Officer.
- D. All client files are secured at the end of each business day, and exterior doors always remain locked.
- E. All computers are set up so they "lock" when not in use, requiring a password to gain access.
- F. Traffic flow in the office is restricted, and no individuals, other than employees, are allowed free access to areas where the client's information is held.
- G. Employees working remotely must utilize passwords to gain access to the SEFG system servers.

- H. SEFG will provide clients with a privacy notice (the “Privacy Notice”) when the client engages SEFG for advisory or other services. The Privacy Notice details the types of non-public client information SEFG collects, the information SEFG shares with third parties or with affiliates, the type of third parties with which SEFG shares information, the policies and practices SEFG has in place to protect confidentiality and security of non-public client information; the procedures SEFG has in place to permit clients or potential clients to opt out of information sharing arrangements with third parties (inapplicable to SEFG so long as SEFG only shares information with third parties for purposes of servicing client accounts), and SEFG’s disposal policy.
- I. SEFG shall deliver an updated Privacy Notice to all of its clients annually, even if the policy has not changed since the previous year. “Delivery” may, to the extent allowed by law, mean notification of the availability of the notice on a website.
- J. Privacy Notices may be included in a quarterly report, newsletter or other client mailing. A copy of SEFG’s current Privacy Notice is attached hereto.
- K. SEFG has undertaken to protect client information in the course of its disposal as well. Employees place material to be shredded in a secure retention container. Here it is held until SUPR SHRED arrives to shred materials in bulk.
- L. The Chief Compliance Officer is responsible for evaluating SEFG’s compliance with this privacy policy on an ongoing basis.

**Secrest Blakey & Associates, LLC d/b/a
Southeast Financial Group (SEFG)**

NOTICE OF PRIVACY POLICY

This is for your information only. No action is required on your part.

At Southeast Financial Group (SEFG), protecting your privacy is very important to us. We want you to understand what information we collect and how we use it. We collect and use “non-public private information”, in order to provide our clients with a broad range of financial services as effectively and conveniently as possible. We treat non-public personal information in accordance with our privacy policy.

What Information We Collect and From Whom We Collect It

We may collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others; and
- Information we receive from non-affiliated third parties, including consumer-reporting agencies.

“Non-public Personal Information” is non-public information about you that we obtain in connection with providing a financial service or product to you.

What Information We Disclose and To Whom We Disclose It

We do not disclose any non-public information about you without your express consent, except as permitted by law. This applies to current as well as former clients. We restrict access to your non-public personal information to broker-dealer firms having regulatory requirements to supervise certain activities of Southeast Financial Group advisors and to those employees, affiliates, and independent third parties who need to know that information in order to provide products and services to you.

Our "affiliates" are companies with which we share common ownership. We do not currently have any affiliated companies.

Our Security Procedures

We maintain physical, electronic and procedural safeguards to protect your non-public personal information. This includes measures to protect your information in the course of disposal.

Brochure

Form ADV Part 2A

Item 1 - Cover Page



SOUTHEAST FINANCIAL
— GROUP —

Secrest Blakey & Associates, LLC

d/b/a

Southeast Financial Group

CRD# 151216

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November 5, 2019

This Brochure provides information about the qualifications and business practices of Secrest Blakey & Associates, LLC d/b/a Southeast Financial Group. If you have any questions about the contents of this Brochure, please contact us at (919) 544-0500 or (704) 947-6126 or email us at esecrest@sefgroup.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.

Secrest Blakey & Associates, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Secrest Blakey & Associates, LLC also is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Material Changes

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements includes providing a Summary of Material Changes (the “Summary”) reflecting any material changes to our policies, practices, or conflicts of interest made since our last required “annual update” filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 29, 2019. The complete Brochure is available to clients at any time upon request.

The following are the material changes in this brochure since the most recent updating amendment made on March 29, 2018. Material changes relate to Secrest Blakey & Associates, LLC’s policies, practices or conflicts of interest only, including the following:

- Revised Item 4 to clarify no current robo-advisory services are being offered to clients or prospects;
- Revised Item 5 to disclose fee information for financial planning services; and
- Revised Item 10 to more accurately disclose potential conflicts of interest and financial affiliations.

The following are the material changes in this brochure since the most recent updating amendment made on March 29, 2019:

- Revised Item 5 to clarify the Firm’s association with Liberty Partners Financial Services, LLC;
- Revised Item 10 to clarify the Firm’s association with Liberty Partners Financial Services, LLC;
- Revised Item 12 to clarify the Firm’s association with Liberty Partners Financial Services, LLC; and
- Revised Item 15 to clarify the Firm’s association with Liberty Partners Financial Services, LLC.

The following are the material changes in this brochure since the most recent updating amendment made on September 13, 2019:

- Revised Item 1 to update the name under which the Firm conducts its advisory business;
- Revised Item 4 to update the Firm’s assets under management; and
- Revised Item 5 to clarify portfolio management fee schedule and the hourly fee for financial planning services.

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Item 4 - Advisory Business

General Information

Secrest Blakey & Associates, LLC d/b/a Southeast Financial Group (“SEFGSEFG”) was formed in 2009 (and registered as an investment adviser in 2012), and provides financial planning and investment portfolio management services to its clients.

Southeast Financial Group, Inc., (owned by Edward B. Secrest), is the principal owner of SEFG. Please see ***Brochure Supplements, Exhibit A***, for more information on these principal owners and other individuals who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

As of November 1, 2019, SEFG manages \$75,943,084 on a discretionary basis, and \$34,145,158 of assets on a non-discretionary basis.

SERVICES PROVIDED

At the outset of each client relationship, SEFGSEFG spends time with the client, asking questions, discussing the client’s investment experience and financial circumstances, and broadly identifying major goals of the client.

Clients may elect to retain SEFGSEFG to prepare a full financial plan. This written report is presented to the client for consideration. In most cases, clients subsequently retain SEFG to manage the investment portfolio on an ongoing basis.

For those financial planning clients making this election, and for other clients who do not need financial planning but retain SEFG for portfolio management services, based on all the information initially gathered, SEFG generally develops with each client:

- a financial outline for the client based on the client’s financial circumstances and goals, and the client’s risk tolerance level (the “Financial Profile” or “Profile”);
- the client’s investment objectives and guidelines (the “Investment Plan” or “Plan”).

The Financial Profile is a reflection of the client’s current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments SEFG will make on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

Finally, where SEFG provides only limited financial planning or general consulting services, SEFG will work with the client to prepare an appropriate summary of the specific project(s) to the extent necessary or advisable under the circumstances.

Financial Planning

This service may be provided as a stand-alone service, or may be coupled with ongoing portfolio management.

Financial planning may include advice that addresses one or more areas of a client's financial situation, such as estate planning, risk management, budgeting and cash flow controls, retirement planning, education funding, and investment portfolio design. Depending on a client's particular situation, financial planning may include some or all of the following:

- Gathering factual information concerning the client's personal and financial situation;
- Assisting the client in establishing financial goals and objectives;
- Analyzing the client's present situation and anticipated future activities in light of the client's financial goals and objectives;
- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio to help meet the goals and objectives of the client;
- Providing estate planning;
- Assessing risk and reviewing basic health, life and disability insurance needs; or
- Reviewing goals and objectives and measuring progress toward these goals.

Once financial planning advice is given, the client may choose to have SEFG implement the client's financial plan and manage the investment portfolio on an ongoing basis. However, the client is under no obligation to act upon any of the recommendations made by SEFG under a financial planning engagement and/or engage the services of any recommended professional.

Portfolio Management

As described above, at the beginning of a client relationship, SEFG meets with the client, asks questions, gathers information and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by SEFG based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, SEFG will manage the client's investment portfolio on a discretionary basis or a non-discretionary basis. As a discretionary investment adviser, SEFG will have the authority to supervise and direct the portfolio without prior consultation with the client. Under a non-discretionary arrangement, clients must be contacted prior to the execution of any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of the portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, the client retains the responsibility for the final decision on all actions taken with respect to the portfolio.

Notwithstanding the foregoing, clients may impose certain written restrictions on SEFG in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For

these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of SEFG.

Sub-Advisers

From time to time, when suitable and in accordance with the Investment Plan for a client, SEFG may recommend the use of separate account managers, each a “Sub-Adviser”. In cases where SEFG recommends the use of one or more Sub-Advisers to manage all or a portion of a client’s portfolio, SEFG will assist the client in the selection of the Sub-adviser(s) most appropriate for the client. The Sub-adviser(s) will be granted discretionary trading authority to provide investment supervisory services for the portfolio, but SEFG retains the authority to terminate the Sub-Adviser’s relationship or to add new Sub-Advisers without specific client consent. With respect to assets managed by a Sub-adviser, SEFG’s role will be to monitor the overall financial situation of the client, to monitor the investment approach and performance of the Sub-adviser(s), and to assist the client in understanding the investments of the portfolio.

From time to time these Sub-advisers may be a part of a wrap program. A wrap program is one in which the Sub-adviser’s fee is combined with brokerage fees, such as commissions, ticket charges, etc., so that one inclusive fee is charged for those services.

Anytime a Sub-adviser is utilized, whether through a wrap program or not, Sub-adviser fees and brokerage expenses of the account(s) will be charged in addition to SEFG’s fee, and will be detailed in the Management Agreement signed by the client.

Retirement Plan Advisory Services

Establishing a sound fiduciary governance process is vital to good decision-making and to ensuring that prudent procedural steps are followed in making investment decisions. SEFG will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the Plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 (“ERISA”) sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, SEFG will be considered a fiduciary under ERISA. For example, SEFG will act as an ERISA § 3(21) fiduciary when providing non-discretionary investment advice to the Plan Fiduciaries by recommending a suite of investments as choices among which Plan Participants may select. Also, to the extent that the Plan Fiduciaries retain SEFG to act as an investment manager within the meaning of ERISA § 3(38), SEFG will provide discretionary investment management services to the Plan.

With respect to any account for which SEFG meets the definition of a fiduciary under Department of Labor rules, SEFG acknowledges that both SEFG and its Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between SEFG and Client.

Fiduciary Consulting Services

- *Investment Selection Services*
SEFG will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).
- *Non-Discretionary Investment Advice*
SEFG provides Plan Fiduciaries and Plan Participants general, non-discretionary investment advice regarding asset classes and investments.
- *Investment Monitoring*
SEFG will assist in monitoring the plan's investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and SEFG will make recommendations to maintain or remove and replace investment options. The details of this aspect of service will be enumerated in the engagement agreement between the parties.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to SEFG are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third-party consultants. Fees paid to SEFG are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, SEFG and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Financial Planning Fees

As noted above, fees for services outside of portfolio management are negotiated separately at the time of the engagement, and are charged at the rate of \$200 per hour, based on the personnel involved as well as the complexity and scope of the project.

Portfolio Management Fees

The maximum annual fee, calculated based on a percentage of the market value of assets under management at the end of the prior quarter, is based on the following schedule:

Up to \$1,000,000	1.20%
\$1,000,001 to \$2,000,000	1.00%
\$2,000,001 to \$4,000,000	0.90%
\$4,000,001 to \$7,500,000	0.70%
\$7,500,001 to \$10,000,000	0.60%
Above \$10,000,000	0.50%

Potential Conflicts of Interest

Advisor receives compensation as a result of a client's participation in trades made through Liberty Partners Financial Services, LLC ("Liberty Partners"). Depending on, among other things, the type and size of the account, type of securities held in the account, changes in its value over time, the ability to negotiate fees or commissions, the historical or expected size or number of transactions, and the number and range of supplementary advisory and client-related services provided to the client, the amount of this compensation may be more or less than what SEFG would receive if the client participated in other programs, whether through Liberty Partners or another sponsor, or paid separately for investment advice, brokerage and other services.

SEFG may impose a minimum portfolio value, and minimum annual fees may apply. SEFG may, at its discretion, make exceptions to the foregoing or negotiates special fee arrangements where SEFG deems it appropriate under the circumstances. The specific arrangements agreed upon will be enumerated in the Investment Advisory Agreement.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization and unless other arrangements are made, fees are normally debited directly from client account(s).

Either SEFG or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client, and any fees due to SEFG from the client will be invoiced or deducted from the client's account prior to termination.

Sub-adviser Fees

In instances where the services of a Sub-adviser are utilized, the Sub-adviser fees will be charged in addition to SEFG's fee, and will be detailed in the Management Agreement signed by the client.

Other Compensation

Certain of SEFG's employees are also registered representatives of Liberty Partners a FINRA and SIPC member, and registered broker/dealer. As such, they are entitled to receive commissions or other remuneration on the sale of insurance as well as other products. In order to protect client interests, SEFG's policy is to disclose all forms of compensation before any such transaction is executed. Clients will not pay both a commission to these individuals and also pay an advisory fee to SEFG on assets held in the same account. These fees are exclusive of each other.

As a result of this relationship, Liberty Partners may have access to certain confidential information (i.e., financial information, investment objectives, transactions, and holdings) about SEFG clients, even if the client does not establish any account through Liberty Partners. If you would like a copy of Liberty Partner's privacy notice, please contact CCO Ed Secrest at (919) 544-0500.

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

SEFG does not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because SEFG has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

SEFG serves individuals, high net worth individuals, pension and profit-sharing plans, corporations, trusts, charitable organizations and estates. SEFG may impose a minimum portfolio value eligible for conventional investment advisory services, and minimum annual fees may apply. Under certain circumstances and in its sole discretion, SEFG may negotiate such minimums.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

In accordance with the Investment Plan, SEFG generally selects mutual funds, ETFs, individual stocks, bonds, REITs, private placements and options for client accounts.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

In making selections of individual stocks for client portfolios, SEFG generally uses fundamental analysis. This type of analysis involves review of the business and financial information about an issuer. Without limitation, the following factors generally will be considered:

- Financial strength ratios;
- Price-to-earnings ratios;
- Dividend yields; and
- Growth rate-to-price earnings ratios

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. SEFG will generally evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

Investment Strategies

SEFG's strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. This means that the following strategies may be used in varying combinations over time for a given client, depending upon the client's individual circumstances.

Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Short Sales – a securities transaction in which an investor sells securities he or she borrowed in anticipation of a price decline. The investor is then required to return an equal number of shares at some point in the future. A short seller will profit if the stock goes down in price.

Margin Transactions – a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Options Trading/Writing – a securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to

purchase or deliver a specified number of shares at a specified price at the exercise of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

Risk of Loss

While SEFG seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While SEFG manages client investment portfolios based on SEFG's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that SEFG allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that SEFG's specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, SEFG will invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. SEFG may invest portions of client assets directly into equity investments, either stocks, or pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. SEFG may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. SEFG may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards,

practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

Risk of Private Investment Vehicles. SEFG may recommend that certain clients invest in privately placed collective investment vehicles, such as private equity funds. Because private investment vehicles are not registered investment companies, they are not subject to the same regulatory reporting or oversight of a registered entity.

Item 9 - Disciplinary Information

SEFG has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Certain of SEFG's employees are also registered representatives of Liberty Partners, a FINRA and SIPC member, and registered broker/dealer. Please see Item 5 - ***Fees and Compensation*** for more information.

SEFG is affiliated with Southeast Financial Property & Casualty, LLC, a property and casualty insurance firm by virtue of common ownership. From time to time, SEFG may refer a client to this firm for insurance services. Southeast Financial Property & Casualty, LLC may also refer a client to SEFG for advisory services. Neither entity pays referral fees to the other. Insurance services provided by Southeast Financial Pro are separate and distinct from SEFG's advisory services, and are provided for separate and typical compensation.

SEFG believes that having these additional services available to clients enhances the overall service that can be provided to clients. SEFG recognizes that there is a potential for conflicts of interest, in that as a part of the financial planning process SEFG personnel may recommend the purchase of insurance or other related products, which could result in a commission or other compensation being paid to one or more individuals in the firm. Clients should be aware that a conflict exists between the interests of SEFG and the interests of the client; and the client is under no obligation to act upon the recommendations of SEFG or any of the named entities above; and if the client elects to act upon any of the recommendations, the client is under no obligation to effect the insurance transaction or financial planning services through any of the entities named herein. However, to help mitigate this potential conflict, SEFG has a policy of fully disclosing all fees to be paid on all transactions prior to the implementation of any recommendations. In addition, SEFG's Code of Ethics, described below, requires that all persons associated with SEFG act in good faith with the clients' interests placed ahead of those of the firm or anyone associated with it.

Ed Secrest is also part-owner of Atlantis Insurance Alliance and Titan Risk Consultants, LLC. In either of his capacities as an owner in these entities, Ed refers clients of his investment advisory business to insurance and consulting services offered by these two entities. Ed also refers clients of Atlantis Insurance Alliance and Titan Risk Consultants, LLC to SEFG for advisory services. Clients should be aware that a conflict exists between the interests of SEFG and the interests of the client; and the client is under no obligation to act upon the recommendations of SEFG or any of the named entities above; and if the client elects to act upon any of the recommendations, the client is under no obligation to effect the insurance transaction or financial planning services through any of the entities named herein.

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

Code of Ethics and Personal Trading

SEFG has adopted a Code of Ethics (“the Code”), the full text of which is available to you upon request. SEFG’s Code has several goals. First, the Code is designed to assist SEFG in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, SEFG owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with SEFG (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for SEFG’s associated persons. Under the Code’s Professional Standards, SEFG expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, SEFG associated persons are not to take inappropriate advantage of their positions in relation to SEFG clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, SEFG’s associated persons may invest in the same securities recommended to clients. Under its Code, SEFG has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause, such as issues with the timing of personal trades relative to the timing of client trades. Accordingly, the Code’s personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Participation or Interest in Client Transactions

Because associated persons may invest in the same securities as those held in client accounts, SEFG has established a policy requiring its associated persons to pre-clear transactions in some types of securities with the Chief Compliance Officer. The goal of this policy is to avoid any conflicts of interest that arise in these situations. By investing in the same securities as clients, SEFG and its associated persons have aligned their interests with those of the clients. Certain securities, such as CD’s, treasury obligations and open-end mutual funds are exempt from this pre-clearance requirement. However, in the event of other identified potential trading conflicts of interest, SEFG’s goal is to place client interests first.

Consistent with the foregoing, SEFG maintains policies regarding participation in initial public offerings (“IPOs”) and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If a SEFG associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person’s shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with SEFG’s written policy.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, SEFG seeks “best execution” for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, SEFG may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of SEFG’s clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

SEFG recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. (“Schwab”), Liberty Partners, or Fidelity Institutional Wealth Services (“FIWS”) (collectively the “Brokers”), FINRA registered broker/dealers, member SIPC, as the qualified custodians to maintain custody of clients’ assets. SEFG may also effect trades for client accounts at the Brokers, or may in some instances, consistent with SEFG’s duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although SEFG may recommend that clients establish accounts at the Brokers, it is ultimately the client’s decision to custody assets with the Brokers. SEFG is independently owned and operated and is not affiliated with the Brokers.

The Brokers provide SEFG with access to its institutional trading, custody, reporting and related services, which are typically not available to the Brokers retail investors. The Brokers also make available various support services. Some of those services help SEFG manage or administer our clients’ accounts while others help SEFG manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform offered by the Brokers. The Brokers brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. As such, SEFG may have an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than based solely on the clients’ interest in receiving most favorable execution.

For SEFG client accounts maintained in its custody, the Brokers generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the Brokers or that settle into the Brokers accounts. The Brokers also make available to SEFG other products and services that benefit SEFG but may not directly benefit its clients’ accounts. Many of these products and services may be used to service all or some substantial number of SEFG accounts, including accounts not maintained at the Brokers.

The Brokers products and services that assist SEFG in managing and administering clients’ accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of SEFG’s fees from its clients’ accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

The Brokers also offer other services intended to help SEFG manage and further develop its business enterprise. These services may include: (i) technology, compliance, legal and business consulting; (ii)

publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. The Brokers may make available, arrange and/or pay third-party vendors for the types of services rendered to SEFG. The Brokers may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to SEFG. The Brokers may also provide other benefits such as educational events or occasional business entertainment of SEFG personnel. In evaluating whether to recommend that clients custody their assets at the Brokers, SEFG may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by the Brokers, which may create a potential conflict of interest.

Directed Brokerage

Clients may direct SEFG to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that SEFG has with the Brokers is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing SEFG to use a specific broker/dealer, clients who are subject to ERISA confirm and agree with SEFG that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker/dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Aggregated Trade Policy

SEFG may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This method permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. It allows SEFG to execute trades in a timely, equitable manner, and may reduce overall costs to clients.

SEFG will only aggregate transactions when it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients, and is consistent with the terms of SEFG's Investment Advisory Agreement with each client for which trades are being aggregated. No advisory 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 SEFG's transactions in a given security on a given business day. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other

factors making the account's participation ineligible or impractical.

SEFG will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of SEFG. SEFG's books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and SEFG will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by SEFG. These factors generally include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Edward Secrest, SEFG's Principal, reviews respective accounts.

For those clients to whom SEFG provides separate financial planning and/or consulting services, reviews are conducted on an as needed or agreed upon basis. Such reviews are conducted by one of SEFG's investment adviser representatives or principals.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. SEFG will provide additional written reports as needed or requested by the client.

Item 14 - Client Referrals and Other Compensation

As noted above, SEFG receives some benefits from the Brokers in the form of support products and services it makes available to SEFG and other independent investment advisors that have their clients maintain accounts at the Brokers. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of the Brokers products and services to SEFG is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither the Brokers nor any other party is paid to refer clients to SEFG.

Item 15 - Custody

The Brokers are the custodians of nearly all client accounts at SEFG. From time to time however,

clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify SEFG of any questions or concerns. Clients are also asked to promptly notify SEFG if the custodian fails to provide statements on each account held.

From time to time, and in accordance with SEFG's agreement with clients, SEFG will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting and pending trades.

As discussed previously in **Item 5 - Fees and Compensation**, certain associated persons of SEFG are registered representatives of Liberty Partners. As a result of this relationship, Liberty Partners may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about SEFG clients, even if the client does not establish any account through Liberty Partners. If you would like a copy of the Liberty Partners privacy policy, please contact Edward Secrest at (919) 544- 0500.

Item 16 - Investment Discretion

As described above under Item 4 - **Advisory Business**, SEFG will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, a Limited Power of Attorney ("LPOA") is executed by the client, giving SEFG the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and, the withdrawal of advisory fees directly from the account. SEFG then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with SEFG and the requirements of the client's custodian.

For *non-discretionary accounts*, the client also generally executes an LPOA, which allows SEFG to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the investment advisory agreement between SEFG and the client, SEFG does not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. As with discretionary accounts, clients may limit the terms of the LPOA, subject to SEFG's agreement with the client and the requirements of the client's custodian.

Item 17 - Voting Client Securities

As a policy and in accordance with SEFG's client agreement, SEFG does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact SEFG with questions relating to proxy procedures and proposals; however, SEFG generally does not research particular proxy proposals.

Item 18 - Financial Information

SEFG does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

Exhibit A

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Edward B. Secrest, CFP®

CRD# 2161058

of

Secrest Blakey & Associates, LLC

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September 13, 2019

This Brochure Supplement provides information about Ed Secrest, and supplements the Secrest Blakey & Associates, LLC ("SEFG") Brochure. You should have received a copy of that Brochure. Please contact us at (919) 544-0500 if you did not receive SEFG's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Ed is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Educational Background and Business Experience

Edward B. Secrest (year of birth 1967) has 28 years of industry experience. In 2009, he co-founded SEFG. He has been a Registered Representative of various broker/dealers since 1990 and has been associated with the broker/dealer Liberty Partners Financial Services, LLC, since 2019. Ed was associated with the broker/dealer LPL Financial, LLC from 2009-2019. Ed's prior experience includes Metropolitan Life Insurance (risk management) and BB&T Asura (financial planning and employee benefit plan design/ implementation). He has owned and operated the financial and insurance services firm ***Southeast Financial Group, Inc.*** since 2001.

Ed earned a Bachelor's degree in Economics at the University of North Carolina at Chapel Hill, and then refined his financial planning skills working in the insurance, investment, and banking industries. Ed is a CERTIFIED FINANCIAL PLANNER™ professional* and served 7 years on the board of directors of the Financial Planning Association of the Triangle Chapter.

* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Ed has no such disciplinary information to report.

Item 4 - Other Business Activities

Ed is a registered representative of Liberty Partners Financial Services, LLC, a FINRA and SIPC member, and registered broker/dealer. As such, he is entitled to receive commissions or other remuneration on the sale of insurance and other products. To protect client interests, SEFG's policy is to disclose all forms of compensation before any such transaction is executed. Clients will not pay both a commission to Ed Secrest and also pay an advisory fee to SEFG on assets held in the same account. These fees are exclusive of each other.

Ed also is a partner in a property and casualty insurance firm (Southeast Financial Property and Casualty, LLC). Ed spends approximately 5% of his time on this other business activity.

From time to time, SEFG may refer a client to this firm for insurance services. Southeast Financial Property & Casualty, LLC may also refer a client to SEFG for advisory services. Neither SEFG nor Southeast Financial Property & Casualty, LLC will receive a fee for making such referrals. Insurance services provided by this firm are separate and distinct from SEFG's advisory services, and are provided for separate and typical compensation.

Ed also maintains an ownership interest in Atlantis Insurance Alliance and Titan Risk Consultants, LLC. In either of his capacities as an owner in these entities, Ed refers clients of his investment advisory business to insurance and consulting services offered by these two entities. Ed also refers clients of Atlantis Insurance Alliance and Titan Risk Consultants, LLC to SEFG for advisory services.

Ed is sole owner of Southeast Financial Group, Inc., which owns 100% of SBA.

Item 5- Additional Compensation

Other than as described above, Ed has no other income or compensation to disclose.

Item 6 - Supervision

Ed Secrest and James Blakey are Principals of Secrest Blakey & Associates, LLC. Ed, along with James Blakey, supervises all duties and activities of the firm. Their contact information is on the cover page of ADV Part 2A, provided in conjunction with this Brochure Supplement.

Investment research is shared by the Principals of SEFG. Each Principal decides how to apply such research to each portfolio he manages. Decisions will be carried out by each respective Principal and his staff members.

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Form ADV Part 2B

Item 1 - Cover Page

John P. Slesman, Ph.D., CFP®

CRD# 5201450

of

Secrest Blakey & Associates, LLC

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September 13, 2019

This Brochure Supplement provides information about John Slesman, and supplements the Secrest Blakey & Associates, LLC ("SEFG") Brochure. You should have received a copy of that Brochure. Please contact us at (919) 544-0500 if you did not receive SEFG's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about John is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Educational Background and Business Experience

John P. Slesman (year of birth 1946) joined SEFG in 2009 and registered as an Investment Adviser Representative of the firm in 2012. John joined Southeast Financial Group, Inc., an insurance and financial services firm, in 2006 as a Financial Advisor, after a thirty-one year career with Bayer CropScience, where he served in numerous managerial positions in both Research and Development. John is a registered assistant of Liberty Partners Financial Services, LLC, a FINRA and SIPC member, and registered broker/dealer. He was also a Registered Representative of LPL Financial, LLC from 2009 to 2019.

John earned his BA degree in Biology from the College of Wooster in 1968 and his PhD in Plant Pathology from The Ohio State University in 1975. John served in the U.S. Army Chemical Corps and was honorably discharged at the rank of 1st Lieutenant.

John is a CERTIFIED FINANCIAL PLANNER™ professional*, Past President of the Financial Planning Association of the Triangle Chapter, and holds FINRA Series 7 (General Securities Representative Exam) and 66 (Uniform Combined State Law Examination) securities licenses.

* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, John has no such disciplinary information to report.

Item 4 - Other Business Activities

John is a registered representative of LPL Financial, LLC, a FINRA and SIPC member, and registered broker/dealer. As such, he is entitled to receive commissions or other remuneration on the sale of insurance and other products. To protect client interests, SEFG's policy is to fully disclose all forms of compensation before any such transaction is executed. Clients will not pay both a commission to John and also pay an advisory fee to SEFG on assets held in the same account. These fees are exclusive of each other.

As disclosed in Item 1, John is also a Financial Advisor for Southeast Financial Group, Inc., which owns 50% of SEFG.

Item 5 - Additional Compensation

Other than as stated above, John has no other income or compensation to disclose.

Item 6 - Supervision

Ed Secrest, Principal of SEFG is responsible for supervising John Slesman and for reviewing accounts. Ed can be reached at (919)544-0500.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Chad Trevithick

CRD# 4664534

of

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September 13, 2019

This Brochure Supplement provides information about Chad P. Trevithick, and supplements the Secrest Blakey & Associates, LLC ("SEFG") Brochure. You should have received a copy of that Brochure. Please contact us at (704) 896-5571 or (919) 544-0500 if you did not receive SEFG's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Chad is available on the SEC's website at

www.AdviserInfo.sec.gov

Item 2 - Educational Background and Business Experience

Chad P. Trevithick (year of birth 05/16/1976) joined SEFG in January, 2018 and serves as a Jr. Financial Analyst. Since joining the financial services industry in 2003, Chad's investment and wealth management experience as a Financial Advisor, District Manager and Managing Associate with boutique and nationally recognized financial planning & wealth management firms has afforded him the opportunity to advise individuals and companies utilizing knowledge of tax and investment strategies, securities, insurance, pension plans and real estate. Chad is a registered assistant with Liberty Partners Financial Services, LLC, a FINRA and SIPC member, and registered broker/dealer.

Chad is a graduate of Newman University in Wichita, Kansas where he earned a triple degree in Business Administration, Marketing & Management.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Chad has no such disciplinary information to report.

Item 4 - Other Business Activities

Other than as described above, Chad has no other Business Activities to disclose.

Item 5 - Additional Compensation

Other than as described above, Chad has no other income or compensation to disclose.

Item 6 - Supervision

Edward Secrest, Principal of SEFG is responsible for supervising Chad. Edward can be reached at 919-544-0500.