

**ITEM 1 – COVER PAGE**

Seiler & Associates, LLC  
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626-432-1600

[www.seiler-associates.com](http://www.seiler-associates.com)

February 7, 2018

This Brochure provides information about the qualifications and business practices of Seiler & Associates, LLC [“S&A”]. If you have any questions about the contents of this Brochure, please contact us at 626-432-1600 and/or [mseiler@seiler-associates.com](mailto:mseiler@seiler-associates.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.

Seiler & Associates is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Seiler & Associates is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 – MATERIAL CHANGES**

Our previous annual updating amendment was dated February 27, 2017. Following is a summary of the material changes made to Part 2 since that amendment.

**Item 4:** Seiler & Associates manages \$49.8 MM in assets on a discretionary basis and \$3.1 million on a non-discretionary basis as of December 31, 2017.

**Item 15:** For accounts where the client has a standing letter of authorization that allows us to transfer money between accounts specified by the client, we are also deemed to have custody. We follow the guidance outlined in the Investment Adviser Association no-action letter dated February 21, 2017, for these accounts. A copy of this letter is available upon request.

Please contact us at 626-432-1600 if you would like a copy of our updated Part 2. Additional information about us is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 4 – ADVISORY BUSINESS

Seiler & Associates, LLC (“S&A” or “the firm”) is an independent financial advisory firm providing asset management and financial planning services.

### Description of Firm

Seiler & Associates is a financial advisory firm servicing individuals, families, and small businesses for all their financial needs. The types of services are described below. The firm has been in business since June 1996. The firm is owned by Mark S. Seiler.

### Employment Standards

As a general standard, at least two years of college and some prior business experience are required for all employees. Graduate work and a specialized business or technical skill are preferred but not required. In addition, each associated person of the firm must meet all examination or experience requirements of the states in which the person provides advisory services.

### Types of Advisory Services

Seiler & Associates provides investment management and financial planning services.

*Investment Management* – Seiler & Associates focuses on long-term investment strategies, best described as asset class investing. The trademarks of this strategy include obtaining an understanding of each client’s investment goals and tolerance for risk so as to determine the proper asset allocation; broad-based global diversification; and use of low-cost mutual funds and ETFs. (Other investment types that may be used are listed below.) The objective is to achieve market rates of return while reducing risk as much as possible. S&A focuses on maintaining desired asset allocation at all times through periodic rebalancing and tax minimization techniques. S&A may incorporate other investments into the investment plan, but generally only when held by a client prior to establishing a client relationship. Where possible, S&A manages each client’s investments with focus on client’s financial plan, as below.

### *Other Investment Types Available for Use*

- Exchange-listed securities
- Securities traded over the counter
- Foreign issues
- Warrants
- Corporate debt securities
- Commercial paper
- Certificates of deposit
- Municipal securities

- Variable life insurance
- Variable annuities
- United States government securities
- Options contracts on securities
- Interests in partnerships investing in real estate, oil and gas interests

If Seiler & Associates is engaged to provide investment management services, clients may impose restrictions on investing in certain securities or types of securities, and S&A will honor such restrictions.

*Financial Planning* – Seiler & Associates works with clients to determine their financial goals. The typical client has a goal of retiring at a certain age and certain income level, and S&A’s financial plan will give certainty to those goals. S&A creates a financial plan for client to achieve such goals, including an investment plan (see above), projections and budgets, and updates for changes in client’s personal circumstances. Other such financial planning goals for clients include funding children’s education expenses, leaving a legacy to heirs, and charitable planning.

#### Wrap Fee Programs

Seiler & Associates does not provide such programs.

#### Assets Under Management

Seiler & Associates manages \$49.8 MM in assets on a discretionary basis and \$3.1 million on a non-discretionary basis as of December 31, 2017.

### **ITEM 5 – FEES and COMPENSATION**

In general, Seiler & Associates is compensated by clients by any of the following arrangements:

- A percentage of assets under management – fee schedule below
- Hourly charges – \$150 to \$250 per hour
- Fixed fees (not including subscription fees)

Investment Management Services:

Fees for management services generally range from 0.50% to 1.00% per year of the assets under management, based on account size and the scope and complexity of the services to be performed. The fee schedule is as follows:

*Fee Schedule for Asset Under Management\**

<i>Account Value</i>	<i>Annual Fee</i>
Up to \$2,000,000	1.00%
Next \$3,000,000	0.75%
Above \$5,000,000	0.50%

\*There is a minimum semi-annual fee of \$750.

The specific manner in which fees are charged by Seiler & Associates is established in a client's written agreement with S&A. S&A will generally bill its fees on a quarterly basis, in arrears. Clients may also elect to be billed directly for fees or to authorize S&A to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. A client may terminate an advisory account on 15 days written notice.

For some clients, Seiler & Associates may assist in identifying an appropriate third party investment advisor. The third party adviser will charge client investment management fees in addition to those charged by S&A.

Although Seiler & Associates believes its fees are competitive, lower fees for comparable services may be available from other sources.

Seiler & Associates' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment advisers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Seiler & Associates' fee, and S&A shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that S&A considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

#### Financial Planning Services:

Hourly rates for financial planning services are negotiated with each client based on the scope and complexity of the requested services, as stipulated in the Financial Planning Agreement, but generally do not exceed \$250 per hour. Clients are generally requested to deposit 50% of the estimated fee upon execution of the Agreement. An invoice for services is issued on completion of the written analysis and is payable upon receipt. Clients may terminate the Financial Planning Agreement, without penalty, at any time on written notice. Upon termination, any prepaid fees will be prorated to the date of termination and unearned fees will be returned to the client.

Seiler & Associates may negotiate a flat fee for financial planning services which will generally range from \$1,000 - \$5,000. The negotiated fees may be higher or lower based on the scope and complexity of the plan to be prepared. For example, higher fees may be charged to individuals with extensive securities holdings, complex plan requirements, or other items which require more time-consuming analysis.

Non-discretionary investment advice is usually part of the financial plan and will be billed based on the negotiated hourly rate or flat fee. Periodic review and rebalancing are offered for the hourly fees.

For clients who will retain Seiler & Associates for ongoing investment supervisory services, the financial planning fees may be included in the investment management fee.

#### Limited Negotiability of Fees

Although Seiler & Associates has established the aforementioned fee schedule(s), S&A retains the discretion to negotiate alternative fees on a client-by-client basis. The facts and circumstances of the client will be considered, including the complexity of the client's issues, assets to be placed under management, and any other relevant factors. The specific annual fee schedule is identified in the contract between S&A and each client.

### **ITEM 6 – PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT**

Seiler & Associates does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **ITEM 7 – TYPES OF CLIENTS**

Seiler & Associates provides portfolio management services to individuals, high net worth individuals, corporations, corporate pension and profit-sharing plans, trusts, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, and other U.S. and international institutions.

Adviser requires a minimum account size of \$500,000 (per client).

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES and RISK OF LOSS**

### Investment Philosophy

1. Modern Portfolio Theory, as recognized by the 1990 Nobel Prize, is the philosophical foundation for how portfolios are structured and how subsequent decisions will be made. The underlying concepts of Modern Portfolio Theory include:
  - Investors are risk averse. The only acceptable risk is that which is adequately compensated by potential portfolio returns.
  - Markets are efficient. It is virtually impossible to anticipate the future direction of the market as a whole or of any individual security. It is, therefore, unlikely that any portfolio will succeed in consistently “beating the market.”
  - The design of the portfolio as a whole is more important than the selection of any particular security within the portfolio. The appropriate allocation of capital among asset classes (stocks, bonds, cash, etc.) will have far more influence on long-term portfolio results than the selection of individual securities. Investing for the long term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
  - For a given risk level, an optimal combination of asset classes will maximize returns. Diversification helps reduce investment volatility. The proportional mix of asset classes determines the long-term risk and return characteristics of the portfolio as a whole.
  - Portfolio risk can be decreased by increasing diversification of the portfolio and by lowering the correlation of market behavior among the asset classes selected. (Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another).
2. Investing globally helps to minimize overall portfolio risk due to the imperfect correlation between economies of the world. Investing globally has also been shown historically to enhance portfolio returns, although there is no guarantee that it will do so in the future.
3. Equities offer the potential for higher long-term investment returns than cash or fixed income investments. Equities are also more volatile in their performance. Investors seeking higher rates of return must increase the proportion of equities in their portfolio, while at the same time accepting greater variation of results (including occasional declines in value).

4. Picking individual securities and timing the purchase or sale of investments in the attempt to “beat the market” are highly unlikely to increase long-term investment returns; they also can significantly increase portfolio operating costs. Such practices are, therefore, to be avoided.

Given these tenets, the underlying approach to managing investment portfolios is to optimize the risk-return relationship appropriate to each client’s needs and goals. Each portfolio is diversified globally employing a variety of asset classes. Mutual funds or managed portfolios will be employed to implement the portfolio and the chosen asset classes will be periodically re-balanced to maintain a more consistent risk / reward profile.

### Methods of Analysis

Seiler & Associates’ main method of analysis derives from the investment philosophy, as described above. S&A analyzes historical data of various asset classes, combining asset classes in various allocations, so as to find the most “efficient” portfolio, which is defined as a portfolio with the highest level of expected return, per unit of risk.

Other methods of analysis that may be employed include the following:

- Charting
- Fundamental
- Technical
- Cyclical

### Investment Risks

Investing in securities involves risk of loss that clients should be prepared to accept. Seiler & Associates uses historical data of broad-based indices to determine risk of loss for each client’s portfolio. The potential loss depends on the amount of risk that each client accepts at the inception of the client relationship.

The principal risks of investing may include one or more of the following: market risk, small companies risk, risk of concentrating in the real estate industry, foreign securities and currencies risk, emerging markets risk, interest rate risk, risk of investing for inflation protection, risk of municipal securities, and/or fund of funds risk. To more fully understand the risks related to an investment in the funds, investors should carefully read each fund's prospectus. Investments in foreign issuers are subject to certain considerations that are not associated with investments in US public companies.

Investments of the International Equity, Emerging Markets Equity and the Global Fixed Income Portfolios will be denominated in foreign currencies. Changes in the relative values of these foreign currencies and the US dollar, therefore, will affect the value of investments in the Portfolios. However, the Global Fixed Income Portfolios and Global Equity Portfolios may utilize forward currency contracts to minimize these changes. Further, foreign issuers are not generally subject to uniform accounting, auditing, and financial reporting standards comparable

to those of US public corporations and there may be less publicly available information about such companies than comparable US companies. Also, legal, political, or diplomatic actions of foreign governments, including expropriation, confiscatory taxation, and limitations on the removal of securities, property, or other assets of the Portfolios, could adversely affect the value of the assets of these Portfolios.

Securities of small companies are often less liquid than those of large companies. As a result, small company stock and the funds which invest in them may fluctuate relatively more in price. Although securities of larger firms fluctuate relatively less, economic, political and issuer specific events will cause the value of all securities and the funds which invest in them to fluctuate as well.

Risk of loss can also be affected by trading strategy. By utilizing a rebalancing strategy, Seiler & Associates may be buying additional securities as they fall in value in the expectation that they will reverse course and rise in value. Should such securities continue to fall in value, such trading strategy will result in additional losses. Risk of loss may also be reduced by this rebalancing strategy. As securities rise in price, rebalancing requires that S&A sell those securities, reducing risk of loss in the future.

In all cases, all strategies are implemented so as to minimize transaction costs (brokerage fees to the custodian) and taxes. Risk of loss due to such factors is minimal.

## **ITEM 9 – DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Seiler & Associates or the integrity of S&A's management. S&A has no information applicable to this Item.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS**

Mark S. Seiler, as principal owner and Managing Member of Seiler & Associates, LLC, is also the owner of Seiler & Associates Certified Public Accountants, a CPA firm which provides accounting, estate planning, and tax preparation services to individuals, trusts, and business entities. Accounting clients who request assistance in financial planning and asset management will be referred to S&A. The CPA firm will not receive compensation for such referral. S&A expects that investment advisory clients may also be clients for whom accounting services are provided. Mr. Seiler expects to spend approximately 50% of his time working with accounting clients. At no time will Seiler & Associates Certified Public Accountants have signing authority for any client which also receives services from S&A.

For some clients, Seiler & Associates may assist in identifying an appropriate third party investment advisor. The third party adviser will charge client investment management fees in

addition to those charged by S&A. S&A receives no compensation from the third party manager for providing a referral.

## **ITEM 11 – CODE OF ETHICS**

Seiler & Associates has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at S&A must acknowledge the terms of the Code of Ethics annually, or as amended.

Seiler & Associates anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which S&A has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which S&A, its affiliates and/or clients, directly or indirectly, have a position of interest. S&A's employees and persons associated with S&A are required to follow S&A's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of S&A and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for S&A's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of S&A will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of S&A's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics and to reasonably prevent conflicts of interest between S&A and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Seiler & Associates' obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. S&A will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Seiler & Associates' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Mark Seiler.

It is Seiler & Associates' policy that the firm will not affect any principal or agency cross securities transactions for client accounts. S&A will also not cross trade between client accounts.

## **ITEM 12 – BROKERAGE PRACTICES**

### The Custodian and Brokers We Use

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see “Item 15: Custody”). Your assets must be maintained in an account at a “qualified custodian,” generally a broker/dealer or bank. We require that our clients use Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker/dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Schwab, then we cannot manage your account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, as described in the next paragraph.

### How We Select Brokers/Custodians

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

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services

- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “*Products and Services Available to Us From Schwab*”)

### Your Brokerage and Custody Costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

### Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to its institutional brokerage— trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Here is a more detailed description of Schwab’s support services:

#### *Services That Benefit You.*

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

#### *Services That May Not Directly Benefit You.*

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or some substantial number of our

clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

*Services That Generally Benefit Only Us.*

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Aggregation of Client Trades

Seiler & Associates performs investment management services for various clients. There are occasions on which we may choose to block (aggregate) trades for your account with those of other client accounts and personal accounts of persons associated with S&A. When we place a block trade, all participants included in the block receive the same price per share on the trade. The price is calculated by averaging the price of all of the shares traded. Due to the averaging of price over all of the participating accounts, aggregated trades could be either advantageous or disadvantageous. Commission costs are not averaged. Clients will pay the same commission whether the trade is placed as part of a block or on an individual basis. The objective of the aggregated orders is to facilitate the executions in a manner that is deemed equitable to the accounts involved.

### **ITEM 13 – REVIEW OF ACCOUNTS**

All accounts are reviewed quarterly by Mr. Seiler for overall adherence with the investment philosophy employed by Seiler & Associates and any specific requirements of the client. A Portfolio Performance Review and Portfolio Statement are provided to discretionary advisory clients not less often than quarterly. These reports contain information about current investment holdings market values.

### **ITEM 14 – CLIENT REFERRALS and OTHER COMPENSATION**

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see “Item 12: Brokerage Practices”). The availability to us of Schwab’s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Seiler & Associates may employ solicitors to whom it will pay cash or a portion of the advisory fees paid by clients referred to it by those solicitors. If you are referred by a solicitor, this practice will be disclosed in writing and we will comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and any similar state rule or statute.

### **ITEM 15 – CUSTODY**

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets.

For accounts where the client has a standing letter of authorization that allows us to transfer money between accounts specified by the client, we are also deemed to have custody. We follow the guidance outlined in the Investment Adviser Association no-action letter dated February 21, 2017, for these accounts. A copy of this letter is available upon request.

You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab’s account statements to the periodic account statements you will receive from us.

## **ITEM 16 – INVESTMENT DISCRETION**

Seiler & Associates usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Seiler & Associates observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to Seiler & Associates in writing.

## **ITEM 17 – VOTING CLIENT SECURITIES**

Seiler & Associates has agreed, for some client accounts, to vote proxies with respect to the issuers of securities in which the assets of the account are invested, so long as such securities are chosen for client's account by the S&A. Client agrees to take all action necessary to insure that proxy solicitations are delivered to S&A in a timely manner, including proxy solicitations received by a third party. Client agrees that proxies for any securities which he/she selects to add to his/her account will be voted on by client, and not by S&A. S&A will accept direction from a client regarding the vote of a specific proxy for that client's account.

Clients for whom S&A has not agreed to vote proxies will receive proxy materials directly from the custodian. S&A will not provide guidance to clients about how to vote a specific proxy.

Clients may obtain a copy of Seiler & Associates' complete proxy voting policies and procedures upon request. Clients may also obtain information from S&A about how S&A voted any proxies on behalf of their account(s).

## **ITEM 18 – FINANCIAL INFORMATION**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Seiler & Associates' financial condition. S&A has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## **ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

Our principal executive officer is Mark Seiler. Additional information regarding Mr. Seiler's education and business background is provided on Part 2B.

S&A is not and has not been involved in any arbitration claims or other proceedings arising from its business. There are no other relationships to disclose with regard to securities.

In our opinion, all material conflicts of interest regarding S&A, our representatives or any of our employees which could be reasonably be expected to impair our rendering of unbiased and objective advice to an advisory client under Section 260.238(k) of the California Code of Regulations have been disclosed.

## ITEM 1 – COVER PAGE

Mark S. Seiler

Seiler & Associates, LLC

3452 E. Foothill Blvd., Suite 400

Pasadena, CA 91107

(626) 432-1600

February 7, 2018

This Brochure Supplement provides information about Mark S. Seiler that supplements the Seiler & Associates, LLC Brochure. You should have received a copy of that Brochure. Please contact Mark S. Seiler, Managing Member at (626) 432-1600 or MSeiler@seiler-associates.com if you did not receive Seiler & Associates, LLC's Brochure or if you have any questions about the content of this supplement.

Additional information about Mark S. Seiler is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2: Educational Background and Business Experience

Mark S. Seiler was born in 1956. He received a BS in Accounting from Seton Hall University in 1978 and graduate work at Seton Hall University, Fairleigh Dickinson University and California State University, Northridge.

### Employment Background

11/00 to Present	Seiler & Associates, LLC, Pasadena, CA Registered Investment Advisor, Managing Member
06/98 to Present	Seiler & Associates Certified Public Accountants, Pasadena, CA CPA Firm, CPA
10/93 to 05/98	Wood, Seiler & Bell, Pasadena, CA CPA Firm, Partner
1985 to 1993	Hinds & Company, Anaheim, CA CPA Firm, Partner
1983 to 1985	Coopers & Lybrand, Newport Beach, CA CPA Firm, Audit Supervisor, Audit Senior

## Professional Designations

### Certified Public Accountant (CPA) – 1985

Certified Public Accountants (CPAs) are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

### Personal Financial Specialist (PFS) – 1999

The Personal Financial Specialist (PFS) credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

## **Item 3: Disciplinary Information**

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. There is no information of this type to report.

#### **Item 4: Other Business Activities**

Mr. Seiler is also a Principal with Seiler & Associates Certified Public Accountants, a CPA firm which provides accounting, estate planning, and tax preparation services to individuals, trusts, and business entities. Accounting clients who request assistance in financial planning and asset management will be referred to S&A. The CPA firm will not receive compensation for such referral. S&A expects that investment advisory clients may also be clients for whom accounting services are provided. Mr. Seiler expects to spend approximately 50% of his time working with accounting clients.

#### **Item 5: Additional Compensation**

Mr. Seiler does not receive any economic benefit from any non-client for providing advisory services.

#### **Item 6: Supervision**

Mark S. Seiler, Managing Member, is responsible for the supervision of all personnel. His telephone number is (626) 432-1600.

#### **Item 7: Requirements for State-Registered Advisors**

Investment advisors who are registered with a state regulatory agency rather than the SEC are required to provide information about a wider range of disciplinary information than that described above. Mr. Seiler has not filed for personal bankruptcy and has no disciplinary information to report.

## ITEM 1 – COVER PAGE

Douglas W. Eichenhofer

Seiler & Associates, LLC

3452 E. Foothill Blvd., Suite 400

Pasadena, CA 91107

(626) 432-1600

February 7, 2018

This Brochure Supplement provides information about Douglas W. Eichenhofer that supplements the Seiler & Associates, LLC Brochure. You should have received a copy of that Brochure. Please contact Mark S. Seiler, Managing Member at (626) 432-1600 or MSeiler@seiler-associates.com if you did not receive Seiler & Associates, LLC's Brochure or if you have any questions about the content of this supplement.

Additional information about Douglas W. Eichenhofer is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2: Educational Background and Business Experience

Douglas W. Eichenhofer was born in 1948. He received a BS in Business Administration from California State University, Los Angeles.

### Employment Background

01/03 to Present	Seiler & Associates, LLC, Pasadena, CA Registered Investment Advisor, Investment Advisor Representative & Director
06/98 to Present	Seiler & Associates Certified Public Accountants, Pasadena, CA CPA Firm, CPA
10/93 to 05/98	Wood, Seiler & Bell, Pasadena, CA CPA Firm, CPA

### Professional Designations

Certified Public Accountant (CPA) – 1990

Certified Public Accountants (CPAs) are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as

a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

#### Personal Financial Specialist (PFS)

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### **Item 3: Disciplinary Information**

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. There is no information of this type to report.

### **Item 4: Other Business Activities**

Mr. Eichenhofer is also a CPA with Seiler & Associates Certified Public Accountants, a CPA firm which provides accounting, estate planning, and tax preparation services to individuals, trusts, and business entities. Accounting clients who request assistance in financial planning and asset management will be referred to S&A. The CPA firm will not receive compensation for such referral. S&A expects that investment advisory clients may also be clients for whom accounting services are provided.

### **Item 5: Additional Compensation**

Mr. Eichenhofer does not receive any economic benefit from any non-client for providing advisory services.

### **Item 6: Supervision**

Mark S. Seiler, Managing Member, is responsible for the supervision of Mr. Eichenhofer. His telephone number is (626) 432-1600.

### **Item 7: Requirements for State-Registered Advisors**

Investment advisors who are registered with a state regulatory agency rather than the SEC are required to provide information about a wider range of disciplinary information than that described above. Mr. Eichenhofer has not filed for personal bankruptcy and has no disciplinary information to report.

## ITEM 1 – COVER PAGE

Yari J. Mejia

Seiler & Associates, LLC

3452 E. Foothill Blvd., Suite 400

Pasadena, CA 91107

(626) 432-1600

February 7, 2018

This Brochure Supplement provides information about Yari J. Mejia that supplements the Seiler & Associates, LLC Brochure. You should have received a copy of that Brochure. Please contact Mark S. Seiler, Managing Member at (626) 432-1600 or MSeiler@seiler-associates.com if you did not receive Seiler & Associates, LLC's Brochure or if you have any questions about the content of this supplement.

Additional information about Yari J. Mejia is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2: Educational Background and Business Experience

Yari J. Mejia was born in 1977. She received a BS in Business Administration from Pontificia Universidad Católica Madre y Maestra, in the Dominican Republic, in 1999 and an AA in Marketing from Los Angeles Valley College, in 2008.

### Employment Background

05/15 to Present	Seiler & Associates, LLC, Pasadena, CA Registered Investment Advisor, Investment Advisor Representative
01/12 to 05/15	JP Morgan Chase, Los Angeles, CA Business Banking, Personal Banker
04/09 to 11/11	VIP Group, Los Angeles, CA Consulting, Sales Supervisor
09/08 to 03/09	Pacific Ambulatory, Los Angeles, CA Medical, Accountant

## Item 3: Disciplinary Information

Registered investment advisors are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. There is no information of this type to report.

#### **Item 4: Other Business Activities**

Ms. Mejia is not involved in any other business activities.

#### **Item 5: Additional Compensation**

Ms. Mejia does not receive any economic benefit from any non-client for providing advisory services.

#### **Item 6: Supervision**

Mark S. Seiler, Managing Member, is responsible for the supervision of Ms. Mejia. His telephone number is (626) 432-1600.

#### **Item 7: Requirements for State-Registered Advisors**

Investment advisors who are registered with a state regulatory agency rather than the SEC are required to provide information about a wider range of disciplinary information than that described above. Ms. Mejia has not filed for personal bankruptcy and has no disciplinary information to report.