

## **Item 1: Cover Page**



**Navigator Financial LLC**

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Form ADV Part 2A  
Firm Brochure  
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This brochure provides information about the qualifications and business practices of Hugo Soares. If you have any questions about the contents of this brochure, please contact us at 860-655-6122. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Hugo Soares also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). C

## **Item 2: Material Changes**

This is Navigator Financial's first filing.

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## **Item 4: Advisory Business**

Navigator Financial was founded in 2025 with the objective of delivering outstanding financial solutions centered on individual client attention that help them achieve their financial goals. The firm's guiding principal is to always be focused on doing what is in the best interest of our clients, even if those recommendations reduce the fees the client pays to the firm. Hugo Soares is the principal owner of Navigator Financial.

### **Types of Advisory Services**

Navigator Financial is strictly a fee-only Financial Planning and Investment Management firm. The firm does not sell annuities, insurance, limited partnerships, or other commissioned products. If in the course of the client's individual financial analysis, Navigator Financial determines that an insurance product might benefit the client's risk profile, then Navigator will make this recommendation known to the client, and at the client's request might help facilitate getting the recommended product. In the course of helping the client facilitate setting up an insurance product, Navigator Financial is not allowed to receive any commission from the insurance provider. The firm is not affiliated with entities that sell financial products or securities. We do not accept any form of commissions for purchasing investments for our clients.

### **Initial Consultation**

As a potential new client, we will offer a free consultation to discuss your current financial situation and goals. Topics like your current income, expenses, career, personal goals, prior investment experience, and investment return expectations will be discussed. This will be used to determine the type of services that Navigator Financial might be able to provide to you to help you achieve your goals. It is important for us to understand who you are, your risk tolerance, your current financial situation, and what you want to accomplish financially. Our meetings with you will help eliminate much of the guesswork so that we can help you achieve the security, independence, and goals you desire.

Should you decide to use our services we might ask for the following:

- Statements of your retirement and non-retirement accounts
- Retirement plans and benefits provided by your current employer
- Tax returns with supporting documents(W-2, 1099...etc)
- Mortgage information
- Student loan debt
- Insurance policies
- Trusts
- Will
- A completed risk profile questioner

In return we will prepare an analysis that outlines a recommended asset mix that is most suitable for your unique financial situation and risk tolerance. It will identify any areas of concern and develop a strategy to address those concerns. It will include objectives and investment options that should cultivate peace of mind. After reviewing and discussing this plan with you, it will be used to guide us in the management of your accounts.

## **TYPES OF SERVICES**

### **INVESTMENT MANAGEMENT**

Navigator Financial offers Portfolio Investment Management services to our clients. This service will include broader financial planning for our clients. We will manage individually tailored investment portfolios based on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We will determine these factors based on personal discussions with the client and will include the client's goals, objectives, family structure, and background.

Investment advice is provided on either a discretionary or non-discretionary basis. When being advised on a non-discretionary basis, each client will make the final investment decisions. When the advisor is advising clients on a discretionary basis, Navigator Financial is authorized to make the investment decisions and place trades for clients. The advisor will have the authority to execute transactions in the account without seeking the client's approval on each transaction. Navigator Financial does not act as a custodian for our client's assets.

### **FINANCIAL PLANNING AND CONSULTING**

Financial planning services provide clients with advice on key topics such as retirement planning, cash flow management, risk management, funding for college, home purchase, starting a business, estate planning, tax planning, long term care, budgeting, and other financial topics. Financial planning services are included as part of the Investment Management service provided the client has \$100,000 in assets under management, but can be provided as a separate service based on a fixed, hourly, or as an ongoing service charge. If the financial planning service is provided on a fixed, hourly, or as an ongoing service charge, then the Client is under no obligation to use Navigator Financial to transact on those recommendations.

#### **Type of Analysis Included in Financial Planning:**

##### **Retirement Planning**

An analysis of current retirement balances, savings rate, investment mix, and years to retirement will be taken into account to determine the likelihood of achieving your financial goals and becoming financially independent. To the extent this analysis shows less than desirable results, recommendations will be made to improve the potential outcome. This can include working longer, increasing the rate of savings, or adjusting the investment mix. For those near or in retirement, advice will be given on an appropriate distribution strategy that will minimize the likelihood of running out of money or of needing to negatively alter your spending during retirement.

## **Social Security and Pension Planning**

Prior to retirement an analysis will be done on the potential implications of taking social security at various retirement ages. This will include the potential implication of spousal benefits. Based on your unique circumstances, Navigator Financial will make a recommendation on when to start taking Social Security benefits. In addition, to the extent a client has a pension with a payout option, Navigator will review the terms and make a recommendation on whether to take the annual payout or the lump sum payment. The client is under no obligation to follow the advice of Navigator Financial.

## **Cashflow Management**

A review of your income and expenses will be reviewed to determine current surplus or deficits. In the case of a surplus, we will provide you advise on how best to prioritize the sue of the surplus. In the case of a deficit, we review your expenses to find potential ways to improve overall cash flows.

## **Debt Management**

To the extent the client has debts, advise will be provided on the prioritization of the repayment of debt that will be based on interest rates, potential tax implications, and cash flow implications.

## **Risk Management**

A risk management review will be conducted to determine your exposure to various risks that could impact your financial future. This may include risks such as concentration risk, premature death, long term care need, property and casualty losses, disability, and litigation risk. Recommendations might be made on ways to reduce these risks that will take into account the potential costs and benefits of such actions.

## **Employee Benefits**

An analysis on the client's employee benefits is done to determine if the client is taking full advantage of the employee benefits available to them. We will also make a recommendation on the employee sponsored retirement plan and/or any stock option plan available to you.

## **Legacy Planning**

To the extent the client wants to plan the transition of assets to their heirs, Navigator Financial will recommend ways to facilitate such a transfer or help with setting up a trust that is in line with the wishes of the client. In addition, if the client wants to plan for any current or future financial needs of their heirs, Navigator financial will help recommend ways to help meet these financial needs.

## **College Planning**

To the extent the client has children or grandchildren that might need college funding, a savings strategy and an analysis of the various savings vehicles will be provided to the client.

## **Tax Strategies**

Advise might include strategies to minimize current and future taxes. This may include strategies on which accounts to place new savings, transfers between account types, and which accounts to take withdrawals from during retirement. This will include current and expected tax brackets during retirement. Planning is based on current or known upcoming changes of current tax law, with consideration that there is the possibility of future changes that could impact your specific situation.

## **Divorce Planning**

Divorce usually has a substantial impact on your financial picture. Navigator financial will work with you through this difficult process to help you understand the potential impact on your financial goals and plans. We can provide a realistic financial picture to you so that you can communicate it to your attorney or mediator. We can provide net worth, cash flow projections, and help you understand the potential implications of a settlement.

## **Client Tailored Services and Client Imposed Restrictions**

Navigator Financial provides the same set of services to all of our clients. However, the goals and objectives of each client will vary based on each client's risk tolerance, income, account balances, retirement needs, and tax levels. Navigator Financial will construct a client specific investment plan that will take all these factors into account. The client may impose restrictions on investing in certain types of securities or any other restrictions they want Navigator Financial to follow. Any client directed restrictions should be stated in writing in the client contract. Any subsequent restrictions should be made in writing, signed by both parties, and have an effective date.

## **Wrap Fee Programs**

Navigator Financial does not participate in wrap fee programs.

## **Item 5: Fees and Compensation**

### **Investment Management Services**

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Portfolio Value	Annual Fee Rate (not to exceed)
Up to 1,000,000	0.75%
1,000,000-5,000,000	0.50%
Over 5,000,000	0.40%

The management fee will be calculated based on the aggregate market value of the Client's portfolio account(s) on the last business day of the previous calendar quarter end period, multiplied by one-quarter the corresponding annual percentage rate (i.e.,  $0.75\%/4 = 0.1875\%$ ). The fair market value of the Portfolio (securities, cash, and cash equivalents) under management shall be valued by the Advisor, in good faith, based on the value of Client's account as reported on the Client's statement provided by the Custodian where the Client's Portfolio is maintained.

Navigator Financial will obtain prior written authorization from the Client to allow us to deduct advisory fees from your account. We will send a copy of your invoice with the amount of the fee to be deducted from your account to you. The Client will authorize the Advisor to deduct the management fee for investment management services from the Client's Portfolio quarterly in arrears by the Custodian as instructed by the Advisor. The management fee will be paid to the Advisor; (1) from any cash balances, if any, in the Portfolio; and (2) from the liquidation or withdrawal of the Client's shares from any money market investment. To the extent that such assets are insufficient to satisfy payment of the Advisor's fee, a portion of the Portfolio assets may be liquidated. The Client understands that if such liquidation occurs, it may affect the relative balance of the Portfolio. For new managed accounts opened between billing periods, Advisor's fee will be based upon a pro-rated calculation of Client assets managed for the prior quarterly period. The Client will also be responsible for any custodial fees, transaction fees, brokerage costs, and any mutual fund or ETF expenses. Navigator financial, at its sole discretion, may negotiate a lesser management fee based upon certain criteria (i.e., pre-existing client, account composition, anticipated future assets, related accounts, type of assets, pro bono activities....etc).

Navigator Financial shall not be compensated on the basis of a share of capital gains upon, or capital appreciation of the Client's Portfolio.

### **Family Pricing**

If one family member maintains at least \$1,000,000 in assets under management with Navigator Financial, then any additional family members (Parents/Siblings/Children/Grand Children) that open an account with Navigator Financial will have their annual fees start at a rate of 0.50%. Additionally, if one family member maintains at least \$5,000,000 in assets under management with Navigator Financial, then any additional family members that open an account with Navigator Financial will have their annual fees start at 0.40%.

## **Financial Planning**

Navigator Financial provides financial planning and consulting on an hourly, fixed fee, or as an ongoing service fee(described below). Prior to engagement, the Client will be provided an estimate of the fee that will be based on the complexity of the plan. Financial Planning will be included free to clients who choose to use the Investment Management service and have at least \$100,000 in assets under management. Investment Management clients with less than \$100,000 in assets undermanagement, will be offered a pro-rata fee for the financial planning service. For example, a client with \$50,000 in assets under management would be charged an hourly fee between \$50-\$100 depending on complexity(50% of the normal \$100-\$200 hourly rate).

Clients are free to purchase investment products based on recommendations made by Navigator Financial through other brokers or agents not affiliated with the company.

### **HOURLY FEES**

Financial Planning fee is an hourly rate that can range between \$100.00 and \$200.00 per hour, depending on complexity. Prior to engagement, the Client will be provided an estimate of the fee. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due.

### **FIXED FEES**

Financial Planning can be charged as a fixed fee that will be agreed upon before the start of any work. The fixed fee can range between \$1,000 and \$10,000 based on the complexity of the Client's financial situation. The fee is negotiable. If a fixed fee program is chosen, half of the fee is due at the beginning of process and the remainder is due at completion of work. In the event of early termination, the client will be billed for the hours worked at a rate of \$200 per hour. If the initial deposit is greater than the amount billed, then the client will be refunded the difference. If the initial deposit is less, then the client will be billed the difference.

### **ONGOING FEES**

Clients who do not wish to use the Investment Management service, but still want financial planning, a regular review of their accounts, and access to financial advice when needed, can choose to pay for an Ongoing Fee Service. Ongoing Fee Services are offered and are based on the Client's individual circumstances and needs. Ongoing fees are charged quarterly in arrears for each billing period. Ongoing Fee Services will continue year over year until canceled, in writing, by either Navigator Financial or the Client. The fee will be negotiated in advance, but will not exceed \$10,000 annually.

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

Navigator Financial does not offer a performance-based fee structure.



## **Item 7: Types of Clients**

### **Description**

Navigator Financial provides personalized confidential financial planning and investment management to individuals, trusts, and estates.

### **Account Minimums**

Navigator Financial does not have established minimum account size requirements.

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

### **Methods of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, relative value analysis, and cyclical analysis. The main sources of information include financial publication, research of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

### **Investment Strategies**

The investment strategy for each client is based upon the objectives stated by the client during consultations. Navigator Financial will recommend a target allocation based upon the client's financial needs, risk tolerance and desired return that will be reviewed with the client prior to implementation. The client may change these objectives at any time. Based upon prevailing market conditions and in the judgment of Navigator Financial, decisions will be made to overweight, or underweight certain asset allocation categories. For certain clients, other strategies may include long-term purchases, short-term purchases, trading, short sales, and margin transactions. Options might be used in a client's portfolio as a risk hedging tool, but Navigator Financial will not trade options without the client's approval. Navigator Financial will not speculate with hedges, unless specifically directed to by the client.

### **Risk of Loss**

The following is a description of the principal risks from investing in securities. Various securities will have some or multiple of the risks listed below that may adversely affect risk and return of the client's portfolio. As with any investment there is a risk of loss that the client should be prepared to bear. Navigator Financial's investment approach constantly keeps the client's risk of loss in mind.

## **Economic and Market Events Risk**

Markets volatility occurs in response to a number of factors, including broader U.S. and global economic turmoil, political changes, military conflicts, and regulatory conditions. Events in both the U.S. and global financial markets may at times result in unusually high market volatility, which could negatively impact performance. The value of a client account will change daily based on changes in markets that are driven by economic conditions, industry changes, political actions, military news, regulatory changes, geopolitical news, and other considerations.

## **Liquidity risk**

Liquidity is the ability to readily convert an investment into cash. It is not always possible to access certain markets or to sell certain investments at a particular time or at an acceptable price, thereby impacting the liquidity of a given portfolio. This can impact the client's ability to access funds.

## **General Investment and Trading Risks**

Clients may invest in securities, and other financial instruments, using strategies and investment techniques with significant risk characteristics. Utilizing investment techniques such as options, margin transactions, short sales, leverage, and derivatives trading, the use of which can, in certain circumstances, adversely impact the client's results.

## **Interest-Rate Risk**

Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, coupons on existing bonds become less attractive, causing the bond's market value to decline.

## **Inflation Risk**

When any type of inflation is present the future purchasing power of a client's assets are eroded.

## **Currency Risk**

Fluctuations in the value of the dollar against the currency of the investment's originating country can affect the value of overseas investments.

## **Reinvestment Risk**

Future proceeds from investments may be reinvested at current market levels and that level may potentially be at a lower rate of return.

## **Management Risk**

Navigator Financial's investment approach may fail to produce the intended results. If an assumption regarding the performance of a specific asset class or investment are not realized, the overall performance of the Client's portfolio may suffer.

## **Cybersecurity Risk**

Navigator Financial and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks may include behaviors such as the unauthorized release of confidential information, denial of service attacks on websites, stealing of account or client information, or other types of cybersecurity breaches. Navigator Financial will attempt to reduce the risk of these incidents from coming to fruition, but there is no guarantee that these efforts will always be successful. In addition, Navigator Financial does not directly control the cybersecurity measures and policies employed by third party service providers.

## **Options Trading**

The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Navigator Financial does not trade options for our clients without consulting with the client first, even in discretionary client accounts. Options might be recommended to a client to hedge risk or to help manage the timing of sales for tax purposes.

## **Trading on Margin**

At times Navigator Financial will buy a security when there are insufficient settled funds in the account. This might be done to invest new cash while the client's funds settle or due to the timing of sales that have not yet settled. This might cause a short period in which the account has a margin balance. Navigator Financial will not actively carry a margin balance as an investment strategy to leverage returns, unless expressly asked to do so by the client in writing.

## **Exchange-Traded Funds**

ETFs are a type of fund bought and sold on a securities exchange. The risks of owning an ETF generally reflects the risks of owning the underlying securities they are designed to track, although the lack of liquidity in an ETF could result in it being more volatile, and ETFs have management fees. ETFs are also subject to other risks, including: (1) the risk that their prices may not correlate perfectly with changes in the underlying reference units; and (2) the risk of possible trading halts due to market conditions or other reasons that would make trading in the ETF inadvisable.

## **Mutual Fund Risks**

A mutual fund's share price and total return are expected to fluctuate with the underlying assets held in the mutual fund. An investment in a mutual fund could lose money over time. Mutual funds also carry fees and other charges that can affect their return relative to the underlying holdings.

## **Common Stocks and Equity-Related Securities**

Prices of common stock may fluctuate due to the economic condition of the company that issued the security, industry and market conditions, and other factors which may fluctuate widely. Similarly, the value of other equity related securities, including preferred stock, warrants, and options may also vary widely.

## **Futures, Commodities, and Derivative Investments**

Certain ETFs and mutual funds may hold commodities, futures, options, and/or swap agreements. These types of instruments can have prices that are highly volatile. Price movements for these types of instruments may be influenced by interest rates, changing supply and demand, trade, fiscal, national and international political events, and economic events. The value of futures, options, and swap agreements also depends upon the price of the commodities underlying them.

## **Highly Volatile Markets**

The prices of financial instruments can be highly volatile. Price movements may be influenced by interest rates, changing supply and demand relationships, trade, fiscal, monetary, exchange controls, economic events, changes in laws, and political policies.

## **Non-U.S. Securities**

Investments in securities of non-U.S. issuers pose a range of potential risks which could include political instability, social instability, nationalization, expropriation, confiscation, imposition of withholding or other taxes on dividends, interest, capital gains or other income and market manipulation. In addition, potentially less information may be available regarding securities of non-U.S. issuers, and non-U.S. issuers may not be subject to accounting, auditing and financial reporting standards, and requirements similar to U.S. issuers. In addition to the risks associated with investments outside of the United States, investments in emerging markets may involve additional risks. Emerging markets generally are not as efficient as those in developed countries and liquidity levels in emerging markets are usually lower than in developed countries.

## **Market Risks**

Turbulence in the financial markets and reduced liquidity may negatively affect investment valuation. If the securities of a company experience's poor liquidity, investors may be unable to transact in a timely manner or at favorable prices, which may decrease returns. In addition, there is a risk that policy changes by central governments and governmental agencies, such as the Federal Reserve or the European Central Bank, which could affect interest rates and could cause increased volatility in financial markets. Furthermore, local, regional, or global events such as war, acts of terrorism, the spread of infectious diseases or other public health issues, recessions, or other events could have a significant impact on investment valuations.

## **Item 9: Disciplinary Information**

Neither Navigator Financial or its employees have ever been involved in any legal or disciplinary events.

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

Navigator Financial has no other financial industry activities or affiliations.

Neither Navigator Financial nor its management persons are registered as a broker-dealer or broker-dealer representative.

Neither Navigator Financial nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

Neither Navigator Financial nor its representatives have any material relationships to any advisory business that would present a possible conflict of interest. Navigator Financial does not utilize nor does it select other sub-advisors.

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

### **Code of Ethics**

Navigator Financial holds itself to a Fiduciary standard. This means the firm will always use good faith to act in the best interest of its clients. This fiduciary standard is at the core of our code of ethics and is the basis of all our dealings. Navigator Financial is focused on fulfilling the needs of our clients and our recommendation are not based on the fees received that we receive for our services. The client is never under any obligation to act on any of our recommendations or are they required to do so through our firm.

## **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Navigator Financial will not recommend or transact for our clients any security in which our firm or a related person has a material financial interest that could reasonably affect the recommendation of fair and unbiased advice.

## **Personal Trading**

No personal trading of any non-mutual fund or non-ETF holdings will be allowed 5 days prior or 5 days after trading that same security for our clients.

Navigator Financial prohibits the use of non-public or inside information in any purchase or sales of client's assets or for personal benefit.

Navigator Financial prohibits any personal transaction or to use internal research for personal benefit that is in conflict with the benefit of our clients.

Navigator Financial's policy is based on the principal that the interest of the Client is our top priority. Every transaction should maintain this fiduciary duty and when a conflict arises, it is our responsibility to put the client's interest over the interest of the company or the advisor.

If after the fact, a previously unknown conflict of interest is ever discovered, Navigator Financial will contact the client as soon as possible and disclose the conflict.

## **Privacy Policy**

The company collects personal information from clients, both verbal and written, and from service providers the client uses that is provided to us. We respect the privacy of our current and potential clients. As such, the company will not disclose non-public personal information to anyone except in the following circumstances:

- When required to provide services our clients have requested; or
- When our clients have specifically requested we do so; or
- When required during the course of a firm's assessment (i.e. internal audit); or
- When permitted and required by law (periodic regulatory exam).

Access to personal information will be restricted to those that need to know that information. All persons and service providers are expected to handle personal information as confidential and is not to be discussed with others unless specifically authorized to do so by the client. This includes discussing information with other family members.

The Chief Compliance Officer of Navigator Financial is Hugo Soares. Mr. Soares reviews all trades each quarter. The personal trading review will ensure that personal trading does not affect the markets and that the Clients of Navigator Financial receive preferential treatment over personal transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select or Recommending Broker-Dealers**

Navigator Financial does not maintain physical custody of the client's assets. The firm may recommend the use of a specific custodian or may utilize a custodian of the client's choosing. Navigator Financial's recommendation will be based on a number of factors including, but not limited to, their ability to transact efficiently, transaction fees, quality of customer service, and reporting ability. Navigator Financial relies on the custodian to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Specific custodian recommendations are made to clients based on their need for such services, however, the final decision on the selection of a custodian remains with the client. The clients pay for any and all custodial fees in addition to the advisory fee charged by Navigator Financial. Navigator Financial will periodically review the capabilities of the custodian to confirm they are providing adequate services for our clients. If a better alternative is found, Navigator Financial might recommend a change of custodian to our clients. Navigator Financial is not affiliated with any custodians.

### **Research and Other Soft-Dollar Benefits**

Navigator Financial does not currently maintain any formal soft-dollar arrangements, where specific products or services are paid for with soft dollars generated for the firm by individual trades the company places in client accounts. However, custodians provide Navigator Financial with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act"). Although Navigator Financial might have an incentive to select a broker-dealer based on the brokerage and research products and services provided by that brokerage, it is the firm's policy that any such benefits are to be secondary to selecting the broker-dealer that best benefits our clients.

Navigator Financial's client accounts will be maintained at a custodian. The custodian generally do not charge separately for custody services, but is compensated by account holders through commissions or other transaction related or asset-based fees for securities trades that are executed through the custodian or that settle into the custodian's accounts.

The custodian selected for a client might also makes available to the firm other products and services that benefit the firm 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 the firm's accounts.

Some of these products and services might include:

- Provide access to client account data (such as trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide research, pricing, and other market data
- Facilitate payment of the Firm's fees from its clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting
- Compliance, legal and business consulting

### **Brokerage for Client Referrals**

Navigator Financial does not receive client referrals from any custodian or third party in exchange for using that broker dealer or third party.

### **Directed Brokerage**

Navigator Financial relationship with our custodian generally requires that trades be executed based on their order routing process. We do not direct which broker should be selected for client account trades. The custodian's order routing process may result in higher commissions, higher prices, less favorable spreads, or other transaction costs. Navigator Financial does not generally accept directed brokerage arrangements (when a client requires that account transactions be affected through a specific broker-dealer).

### **Order Aggregation**

Navigator Financial may aggregate brokerage orders for its clients and allocate the securities purchased or sold among the participating accounts, with each account receiving the same terms. Navigator Financial will proportion the purchase to various accounts based on investment objectives, current allocation, cash availability, expected cash and liquidity needs, and other relevant factors. Based on these factors, if it is determined that a client should get an allocation of the purchase, no client will be intentionally favored over another client.

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

### **Periodic Reviews**

#### **Investment management Services**

Portfolios are reviewed on a periodic basis or as needed by the client. Navigator Financial will review all investment management accounts on a daily or weekly basis, as deemed needed by the advisor, but the advisor will review the client's accounts on a monthly basis at a minimum. Weekly and even daily monitoring of all accounts will be done when market conditions become more volatile.

#### **Financial Planning Services**

When Navigator Financial is engaged on an ongoing basis by the client, Financial Plans will be reviewed on a monthly, quarterly, or at the very least on an annual basis, based on the nature of the engagement. If the client engages Navigator Financial on a fixed one-time basis, the company recommends at least an annual review and update of the Financial Plan.



## **Non-Periodic Reviews**

When market conditions become more volatile, account reviews may occur more frequently as needed. In addition, a change in the client's financial circumstances such as termination of employment, divorce, relocation, or retirement would trigger a review. In addition, changes to tax law or other new information may trigger a review.

## **Reports**

Clients receive either a quarterly or monthly statement from the custodian. Navigator Financial may also provide Investment Management clients with semi-annual or annual performance reports.

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

Navigator Financial only receives compensation and economic benefits from clients in exchange for advisory services. We do not receive any economic benefit from any third party for advice rendered to our clients.

Navigator Financial may compensate individuals or firms for providing client referrals to the firm. If a client is referred to us in exchange for a fee, this practice will be disclosed to the client. This referral fee will generally be paid as a portion of the advisory fees earned for managing the assets of the client. The fees paid to referral sources will come from Navigator Financial's funds and the referral fee will not affect the total fees the client pays to Navigator Financial. In each instance, a written agreement will exist between Navigator Financial and the referral source. Clients referred to Navigator Financial for a fee will be notified of such an agreement and any conflicts with the arrangement will be disclosed through verbal or written disclosures. The use of solicitors is strictly regulated under applicable federal and state law. Navigator Financial's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

## **Item 15: Custody**

Navigator Financial does not take physical possession of the client's funds or securities. However, given that we may be granted authority to deduct the advisory fees from your account, we are deemed to have custody of the account. Navigator Financial will obtain prior written authorization from you to allow us to deduct advisory fees from your account. All of your assets are held at a qualified custodian, which means the custodian will provide account statements directly to you at your address of record at least once a quarter. Navigator Financial does not hold any client assets. We will send a copy of your invoice with the amount of the fee to be deducted from your account to you. The invoice will specify the amount of the fee, the formula used to calculate the fee, the AUM(Assets Under Management) that the fee was based on, and the time period the fee covers. The custodian will send to the client, at least quarterly, an account statement providing a detailed report of the assets in the account at the end of the period. The statement will also include all transactions in the account during that period, including the amount of advisory fees that was paid directly to us. Clients should carefully review those statements. If the client finds significant discrepancies in any of the statements they receive, the custodian and Navigator Financial should be notified. Otherwise, Navigator Financial may only direct the movement of funds from one account to another account that belongs to the same client, but has no other access to the client's assets and funds.

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

Navigator Financial accepts discretionary authority to manage securities in client accounts. For these discretionary accounts, the firm has full trading authority under a limited power of attorney assigned to Navigator Financial. As a result, Navigator Financial has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The firm follows the investment strategy as set forth in the investment management agreement. Clients may place restrictions on the firm's discretion authority in writing.

Non-discretionary accounts are managed for clients not willing or unable to provide limited power of attorney to Navigator Financial. For these non-discretionary accounts, Navigator Financial consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

As previously noted, we offer our advisory services on a discretionary basis (meaning that we do not need advance approval from the client to determine the type and amount of securities to be bought and sold for the client's account) and on a non-discretionary basis (meaning that we need advance approval from the client to determine the type and amount of securities to be bought and sold for the client's accounts before each and every transaction). We may only exercise discretion if you have provided that authority to us in writing. This authorization is typically included in the investment advisory agreement you enter into with us. The discretionary authority you grant to us does not provide us the ability to choose the custodian, through whom transactions for the client's account will be executed or to negotiate brokerage fees or expenses. Additionally, our discretionary authority does not provide us the ability to withdraw funds from the client's account (other than to withdraw our advisory fees which may only be done with the client's prior written authorization). We will exercise discretion in a manner consistent with the stated investment objectives of the client.

## **Item 17: Voting Client Securities**

### **Proxy Votes**

Navigator Financial clients may periodically receive proxies or other solicitations directly from the custodian or transfer agent. Navigator Financial does not vote upon proxies on behalf of clients currently. We may provide advisory clients with administrative assistance regarding proxy voting or issues; however, you have the responsibility to receive and vote any proxies. Clients should contact their custodian or a transfer agent with questions about a particular solicitation.

## **Item 18: Financial Information**

### **Financial Condition**

Navigator Financial does not require or solicit fees of more than \$1,000.00 per client six months or more in advance. Navigator Financial has never filed for bankruptcy and is not aware of any financial condition that is reasonably likely to impair the firm's ability to meet the contractual commitments to clients.