

STRATEGIC NAVIGATORS

PRIVATE WEALTH

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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 Strategic Navigators Asset Management, LLC dba Strategic Navigators Private Wealth. If you have any question about the contents of this brochure, please contact us at (616) 369-7774. 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.

Strategic Navigators Private Wealth is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Strategic Navigators Private Wealth is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Strategic Navigators Private Wealth's CRD number is 323003.

Item 2 - Material Changes

We have two material changes to report since our last annual update on March 19, 2024.

- Cover page – As of October 2024, the firm Strategic Navigators Asset Management, LLC is now doing business as Strategic Navigators Private Wealth.
- We moved office locations from 1500 E Beltline Ave., SE, Suite 200, Grand Rapids, MI 49506 to our new location at 5030 Corporate Exchange Blvd SE, Suite 201, Grand Rapids, MI 49512.

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Item 4 – Advisory Business

OWNERSHIP/ADVISORY HISTORY

Strategic Navigators Asset Management, LLC dba Strategic Navigators Private Wealth (“We”) is a Michigan Limited Liability Company founded in July 2022. We became registered as an investment adviser in August 2022. We are owned by Jeffrey Stukey, our managing member and chief compliance officer, and Strategic Navigators Consulting, LLC. Additional information about Mr. Stukey can be found under Item 19 along with his supplemental brochure.

ADVISORY SERVICES OFFERED

FINANCIAL PLANNING

We offer a complementary comprehensive financial plan that involves a review of your financial situation, goals, and risk tolerance. Through a series of personal interviews and/or the use of questionnaires, we will collect pertinent data, identify goals, objectives, financial problems, and potential solutions. With this information, we tailor your financial plan and advice we give to you. Our advice may cover any of the following topics: net worth statement; cash flow analysis; tax analysis; insurance and long-term care analysis; tax planning; retirement projection; 401k review; or other needs as identified during our meetings with you. Following our meetings, you will receive a written financial plan.

PORTFOLIO MANAGEMENT

Our portfolio management services are offered to assist with the ongoing management of your investment accounts. We work with you to understand your investment objectives, time frame and risk tolerance. With this information we create a customized portfolio. We will request discretionary authority from you to select securities and execute transactions without permission from you prior to each transaction. We base our investment recommendations on a variety of factors including, but not limited to, performance risk, fees, tax efficiency of different investment strategies, as well as your input and preferences regarding the strategies.

At times, we may recommend the services of a sub-adviser that has investment strategies we don’t offer.

Once a sub-adviser is selected, we continue to monitor them to ensure that they adhere to the philosophy and investment style for which they were selected. We will retain discretionary authority to hire and fire the sub-adviser and when necessary, reallocate your assets to a new sub-adviser. The sub-adviser will have full discretion to select the securities and execute transactions without prior permission from you prior to each transaction. We can, but don’t always, recommend Wealthspan Investment Management, LLC (CRD #309553), which is owned by one of our owners, Jeffrey Stukey. Please see Item 10 for additional details. We have other institutional sub-advisers available through Fidelity Investments, Charles Schwab & Co., Inc. and Altruist Financial, Inc., which are the custodians we recommend. A complete description of the sub-adviser’s services and fees will be disclosed in the sub-adviser’s Form ADV Part 2A or equivalent brochure which will be provided to you.

TAILORED SERVICES

The goals and objectives for each client are documented before any investing takes place. You may impose restrictions on investing in certain securities or types of securities.

WRAP PROGRAM

We do not sponsor a wrap fee program.

CLIENT ASSETS MANAGED

As of February 1, 2025, we currently manage \$10,970,355 in client assets on a discretionary basis. We also advise and monitor on \$1,201,518 in client assets held with third-party advisers.

Item 5 – Fees and Compensation

INVESTMENT MANAGEMENT AND USE OF SUB-ADVISER SERVICES

We charge an annual management fee based on the percentage of assets under management as reported by the custodian. Our maximum annual management fee is 1.50%. The management fee is calculated and collected monthly, in arrears; meaning the management fee is calculated and collected based on the custodian reported account value as of the last business day of the month. For example, an account value of \$500,000 multiplied by 1.00% divided by 12 months equals \$416.67 ($\$500,000 \times 0.01 / 12 = \416.67). The initial month's management fee will be prorated for the number of days the account was managed during the month. Cash balances and investments in money market funds, demand deposit accounts, or certificates of deposit held in the account are included in the fee calculations.

Our management fee does not include any sub-adviser's management fee. The sub-adviser's maximum annual management fee is 0.60%. The total fees will be acknowledged and disclosed to you in the investment management agreement.

You will be asked to authorize us or the sub-adviser with the ability to instruct the custodian to deduct our management fee and the sub-advisers from your account. You may cancel this authorization at any time. Please see Item 15 for additional details regarding fee deduction.

Fees are negotiable based on the size of the account. You may aggregate accounts to achieve a lower fee.

OTHER FEES AND EXPENSES

Our fees are separate and distinct from any other fees or expenses. You may incur certain charges imposed by custodians, brokers, 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, our fee and we will not receive any portion of these commissions, fees, and costs. For more information about our brokerage practice please see Item 12.A.

TERMINATION OF SERVICES

You may terminate any of our services for any reason within the first five (5) business days after signing the contract without any cost or penalty for a full refund. Thereafter, the contract may be terminated at any time by giving ten (10) days written notice. All management fees will be prorated through the day of cancellation. To cancel the agreement, you must notify us in writing to 5030 Corporate Exchange Blvd SE, Suite 201, Grand Rapids, MI 49512.

OTHER SECURITIES COMPENSATION

We do not receive any additional securities compensation.

RETIREMENT ROLLOVER CONFLICTS OF INTEREST

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts of interest with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours.

Item 6 – Performance-Based Fees and Side by Side Management

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or provide side by side management.

Item 7 – Types of Clients

We offer our services to individuals, high net worth individuals, and corporations and other business entities. We do not require a minimum balance.

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

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

When we create your portfolio, we start by identifying the proper asset allocation. Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon. The asset classes typically include US equities, US fixed-income, international equities, international fixed-income, as well as cash and equivalents. The risk associated with asset allocation is that each class has different levels of risk and return, so each will behave differently over time. There is no guarantee that diversification among asset classes will grow a portfolio.

Next, we identify whether we will use a passive investment strategy, tactical investment strategy, or a combination thereof for your account(s). We will also utilize fundamental and technical analysis. A general description of these investment strategies and methods of analysis are described below:

A tactical investment strategy is an active investment management strategy that rebalances the percentage of assets held in various asset classes in order to take advantage of market pricing anomalies or strong market sectors. This strategy is designed to allow portfolio managers to create value by taking advantage of certain situations in the marketplace. A goal of tactical asset management is to limit losses by underweighting asset classes that are underperforming. The risk associate with tactical asset allocation is that overweighting or underweighting certain asset classes may lead to underperformance compared to an even weighted portfolio. There is also no guarantee that overweighting or underweighting certain asset classes will grow a portfolio better than passive investing.

A passive investment strategy is an investment management strategy in which investors buy and hold a diversified mix of assets in an effort to match, not beat, the market. The most common passive investing approach is to buy an index fund, whose holdings mirror a particular or representative segment of the financial market. Passive investing is the opposite of active tactical investing. Additional benefits of passive investment management are that a portfolio typically has good diversification, low turnover (good for keeping down internal transaction costs and potentially capital gains taxes), and possibly lower investment management fees.

With respect to our recommendation of sub-advisers, we attempt to match your individualized needs, goals, and objectives with the sub-adviser's methods of analysis and investment strategies. Please refer to the sub-adviser's ADV Part 2A – Item 8.A for a full description of their methods of analysis and investment strategies.

INVESTMENT RISKS

All investment programs have certain risks that are borne by you and **investing in securities involves risk of loss that clients should be prepared to bear**. Our goal is to reduce the risk of loss, but not at the expense of portfolio growth. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. To manage risk, we rebalance model portfolios on an as needed basis to bring the asset allocations back to their intended balances. You should feel free to ask questions about risks that you do not understand; we would be pleased to discuss them.

RECOMMENDED SECURITIES

We use several types of securities in your portfolios including, but not limited to, mutual funds, exchange traded funds (ETFs), stocks, bonds, and structured notes. Some of the risk associated with these securities include:

- **Credit Risk:** This is the risk an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.
- **Interest Rate Risk:** The chance that bond prices overall will decline because of rising interest rates.

- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social, or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.
- **Liquidity Risk:** Liquidity risk exist when particular investments are difficult to purchase or sell, possibly preventing the ability to sell such illiquid securities at an advantageous time or price, or possibly requiring the client to dispose of other investments at unfavorable times or prices in order to satisfy its obligations.
- **Manager Risk:** The chance that the proportions allocated to the various securities will cause the client’s account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **Stock Market Risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- **Mutual Fund Manager Risk:** The chance that the proportions allocated to the various mutual funds will cause the client’s account to underperform relevant to benchmarks or other accounts with similar investment objective.
- **Pricing Transparency Risk:** There is no uniform standard pricing, making it harder to compare the net-of-pricing attractiveness of alternative structured products offerings than it is to compare the net expense ratios of different mutual funds or commissions among broker-dealers. Many structured product issuers work the pricing into their option models so that there is no explicit fee or other expense to the investor. This means the investor cannot know for sure what the implicit costs are.

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 each supervised person providing investment advice. These include the following:

- A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which the *firm or supervised person*
 1. was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. is the named subject of a pending *criminal proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful

taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;

3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or
4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the *supervised person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.

We have no information applicable to this item.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the *firm* or *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority
 - i. denying, suspending, or revoking the authorization of the *supervised person* to act in an *investment-related* business;
 - ii. barring or suspending the *supervised person's* association with an *investment-related* business;
 - iii. otherwise significantly limiting the *supervised person's investment-related* activities; or
 - iv. imposing a civil money penalty of more than \$2,500 on the *supervised person*.

We have no information applicable to this item.

C. A *self-regulatory organization (SRO) proceeding* in which the *firm* or *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

We have no information applicable to this item.

D. Any other *proceeding* in which a professional attainment, designation, or license of the *supervised person* was revoked or suspended because of a violation of rules relating to professional conduct. If the *supervised person* resigned (or otherwise relinquished his

attainment, designation, or license) in anticipation of such a *proceeding* (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

We have no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

BROKER DEALER AFFILIATION

We are not affiliated with a broker-dealer.

FUTURES/COMMODITIES FIRM AFFILIATION

We are not affiliated with a futures or commodities broker.

OTHER INDUSTRY AFFILIATIONS

Our owners and associates may be licensed insurance agents. They may recommend the sale of insurance products to you. This other business activity pays them commissions that are separate from the fees described in Item 5, above. The commissions give them a financial incentive to recommend and sell you the insurance products. They will attempt to mitigate any conflicts of interest to the best of their ability through the implementation of policies and procedures that address the conflicts therewith by placing your interests ahead of their own. In addition, you always have the right to choose whether to act on the recommendation, and you have the right to purchase recommended insurance through any licensed insurance agent.

Our owner, Mr. Stukey, is the owner of and dually registered as an investment adviser representative with Wealthspan Investment Management, LLC, a SEC registered investment adviser. He may recommend other advisory services to you through Wealthspan Investment Management, LLC. This other business activity pays him fees that are separate from the fees described in Item 5, above. The fees give him a financial incentive to recommend these advisory services to you. Mr. Stukey attempts to mitigate any conflicts of interest to the best of his ability through the implementation of policies and procedures that address the conflicts therewith by placing the client's interests ahead of his own. In addition, you always have the right to choose whether to act on the recommendation, and you have the right to use other advisory services through any investment adviser representative or firm.

Our indirect owner, Joshua Sherrard, is also a co-owner of Strategic Navigator Accounting. We may recommend its services to our clients. We do not receive any fees for the referral. However, Mr. Sherrard, as a co-owner of the accounting firm, has a financial incentive to recommend its services because it charges a separate fee for its services. We attempt to mitigate any conflicts of interest to the best of our ability through the implementation of policies and procedures that require us to place your interests ahead of our own. In addition, you always have the right to choose whether to act on the recommendation and you have the right to receive recommended accounting services through any accounting firm.

RECOMMENDATION OF THIRD-PARTY INVESTMENT ADVISER

We may utilize the services of a sub-adviser to manage some or all of your assets on a discretionary basis and in accordance with your investment objectives. We will ensure that the

sub-adviser is properly registered or exempt from registration in your state of residence prior to making any recommendations. A detailed description of these services can be found under Items 4 and 5.

Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading

DESCRIPTION

Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Our Code of Ethics covers all supervised persons and it describes our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes, among other things, provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All supervised persons must acknowledge the terms of the Code of Ethics annually or as amended.

MATERIAL INTEREST IN SECURITIES

We do not have a material interest in any securities.

INVESTING IN OR RECOMMENDING THE SAME SECURITIES

Our staff is permitted to engage in personal securities transactions. These transactions create potential conflicts of interest if they were to trade in advance in a security that is owned by you or considered for purchase or sale on your behalf. We have adopted policies and procedures that are reasonably designed to effect transactions for you in a manner consistent with the fiduciary duty owed to each client. Our staff who buys and sells the same securities bought or sold for a you may do so only if they comply with our written policies and procedures.

Item 12 – Brokerage Practices

RECOMMENDATION CRITERIA

We do not maintain custody of client assets. Your assets must be maintained in an account at a “qualified custodian,” which is generally a broker-dealer or bank. We recommend that you use Charles Schwab & Co., Inc. (“Schwab”), Altruist Financial LLC, and or Fidelity, Members FINRA and SIPC as qualified custodians.

Please Note: You may be able to obtain lower commissions and fees from other brokers, and the value of products, research and services given to the applicant is not a factor in determining the selection of broker-dealers or the reasonableness of their commissions.

RESEARCH AND SOFT DOLLARS

“Soft dollars” are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a

particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. We don't receive any soft dollars; however, we receive non-economic benefits through our relationship with Schwab and Altruist, please see Item 14 for additional details.

BROKERAGE FOR CLIENT REFERRALS

We do not receive client referrals or any other incentive from any broker-dealer or custodian.

DIRECTED BROKERAGE

We do not allow directed brokerage.

TRADE AGGREGATION

We may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and each client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. We may determine not to aggregate transactions, for example, based on the size of the trades, the number of client's accounts, the timing of the trades, the liquidity of the securities or the discretionary or non-discretionary nature of the trades. If we do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that the practice of not aggregating may cost clients more money.

Item 13 – Review of Accounts

PERIODIC REVIEWS

Our owner, Mr. Stukey, will review and monitor portfolio accounts monthly. He also attempts to meet with you at least annually either in person, by telephone, or zoom meeting to conduct a review and provide any updates to your financial situation.

OTHER REVIEWS

Additional reviews are conducted periodically depending on the market conditions, economic or political events, or by changes in your financial situation (such as retirement, termination of employment, physical move, or inheritance).

REPORTS

You will receive a written financial plan for your complementary financial planning services. You will also receive at least quarterly account statements from the account's custodian. We urge you to carefully review such statements.

Item 14 – Client Referrals and Other Compensation

OTHER COMPENSATION

We may receive non-economic benefits from Fidelity, Schwab and Altruist in the form of the support products and services they make available to us and other independent advisors whose

clients maintain their accounts with these custodians. These include a fully digital account opening process, a variety of available investments, and software tools that can benefit us and our clients.

CLIENT REFERRALS

We do not pay for client referrals or use solicitors.

Item 15 – Custody

All your funds, securities and accounts are held at a qualified custodian. We do not take possession of your securities. However, you will be asked to authorize us or the sub-adviser with the ability to instruct the custodian to deduct our management fee and the sub-adviser's management fee from your account. This authorization will apply to our management fee only. This is considered a limited form of custody. You may terminate this authorization at any time. You will receive at least quarterly account statements from the custodian that holds and maintains your assets. We urge you to carefully review these account statements.

Item 16 – Investment Discretion

We offer discretionary investment management services. With discretionary investment management services, you must sign the investment management agreement to grant us discretionary power over your account. The investment management agreement provides us with the ability to delegate the discretionary power to the sub-adviser and contains a limited power of attorney that allows the sub-adviser to select the security, the amount and the time of the purchase or sale in your account. It also allows them to place each trade without your prior approval. Our discretionary authority is limited to hiring and firing the sub-adviser and reallocating your accounts to another sub-adviser. The custodian may request that you sign the custodian's limited power of attorney. This varies with each custodian. We discuss all limited powers of attorney with you prior to their execution. In all cases, however, discretionary will be exercised in a manner consistent with the stated investment objectives for your account and any other investment policies, limitations, or restrictions.

Item 17 – Voting Client Securities

We do not vote proxy votes. All proxy materials are mailed or emailed directly to you from the custodian. Any proxy materials received by us will be forwarded to you for response and voting. In the event you have a question about proxy solicitation, you should feel free to contact us.

Item 18 – Financial Information

BALANCE SHEET

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to provide a balance sheet.

FINANCIAL CONDITION

We are required in this Item to provide you with certain financial information or disclosures about our financial condition if we have a financial commitment that impairs our ability to service you. We do not have a financial commitment that impairs our ability to service our clients.

BANKRUPTCY

We have not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

We have one principal executive officer, Jeffrey Stukey (“Mr. Stukey”). Mr. Stukey’s biographical information is provided in the attached Brochure Supplement Document.

We are required to disclose additional information if he has other business activities, receives a portion of performance-based fees, or has any relationship or arrangement with an issuer of securities. Mr. Stukey does not receive performance-based fees, nor does he have any relationship or arrangement with an issuer of securities. He is a licensed insurance agent and may receive commissions for the sale of insurance products. He is also dually registered as an investment adviser representative of Wealthspan Investment Management, LLC. Additionally, he owns Wealthspan Advisors, LLC, an independent financial planning practice; Renown Advisors, LLC an insurance and marketing organization; and Wealthspan Financial Partners, LLC, where he creates insurance and other financial products or technology for insurance companies. These activities and any conflicts of interests associated therewith are discussed in Item 10 above and in his Brochure Supplement Document.

We have NOT been involved in any of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or another wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or other being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.