

## D Street Financial LLC

Mt. Dora, Florida

### **Form ADV Part 2A – Firm Brochure**

(352) 321-2899

Dated March 8, 2022

This Brochure provides information about the qualifications and business practices of D Street Financial LLC, “D Street”. If you have any questions about the contents of this Brochure, please contact us at (352) 321-2899. 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.

D Street Financial LLC is registered as an Investment Adviser with the State of Florida. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about D Street is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 318896.

## Item 2: Material Changes

---

Since this is the first filing of the Form ADV Part 2A for D Street, there is nothing to report. In the future, any material changes made during the year will be reported here.

## Item 3: Table of Contents

---

### Contents

Item 2: Material Changes.....	2
Item 3: Table of Contents .....	2
Item 4: Advisory Business .....	3
Item 5: Fees and Compensation .....	5
Item 6: Performance-Based Fees and Side-By-Side Management.....	7
Item 7: Types of Clients .....	7
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....	8
Item 9: Disciplinary Information .....	11
Item 10: Other Financial Industry Activities and Affiliations.....	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	11
Item 12: Brokerage Practices.....	13
Item 13: Review of Accounts .....	14
Item 14: Client Referrals and Other Compensation .....	14
Item 15: Custody.....	14
Item 16: Investment Discretion .....	15
Item 17: Voting Client Securities .....	15
Item 18: Financial Information .....	15
Privacy Notice .....	17
Form ADV Part 2B – Brochure Supplement.....	18

# Item 4: Advisory Business

---

## Description of Advisory Firm

D Street Financial LLC (D Street) is registered as an Investment Adviser with the State of Florida. We were founded in September 2021. Stacy Gary is the principal owner of D Street. Because D Street is a new entity, its Assets Under Management are not yet reported.

D Street seeks to provide clarity and understanding for every client. D Street is only compensated directly from clients – or said differently, clients of D Street are the only ones that pay D Street. There are no payments received from custodians, mutual funds, managers, etc.

D Street is primarily engaged in providing counsel in making important life decisions which may or may not be financial in nature. Many of these issues are in the area of what is generally considered financial planning. However, some life decisions are not primarily financial in nature, and if D Street is competent to provide insight or guidance, it will. Otherwise, the client will be referred to seek the counsel of a competent professional in the field in which the client needs help.

All services offered by the firm are tailored to the individual situation of each client, with the areas most commonly addressed described below.

## Types of Advisory Services

### Financial Planning

Comprehensive financial planning addresses all aspects of a client's life that intersects with money. Below are a few examples of what that might look like. This is not a comprehensive list of financial planning services to choose from. Rather, they are examples to help give language to common areas of financial planning that we cover with clients during the financial planning process.

- **COACHING/COUNSELING:** Client meetings are designed to help you identify your values, goals, and priorities, and how they relate to money. They focus on exploring what matters most to you, your priorities, opportunities and obstacles, and identifying what is meaningful to you. D Street provides support in decision-making along with research, analysis, and help with prioritization.
- **SCENARIO PLANNING:** Whether you are assessing how to shape your future life, trying to choose among different uses for the same pot of money, or whether you are financially ready to retire from your business, scenario planning will provide you with the tools to assess each potential choice. Scenario planning shows the likely outcome of specific approaches toward the future you desire. It is designed to give you an overview to help you make decisions about your priorities and some resources that can help you better pursue your goals.

- **CASH FLOW PLANNING:** Cash flow planning addresses the issues of organizing and monitoring your cash flow. Cash flow projections are made taking into account potential sources of future income, estimated future expenses, and best strategies for maximizing assets used for future needs.
- **ESTATE PLANNING:** Estate planning involves the creation of a plan that addresses both financial assets and personal values in the distribution and transfer of wealth. The firm gives special attention to the legacy you want to leave – your values and concerns, and how to express them in a positive and helpful way.
- **RISK (INSURANCE) PLANNING:** Risk planning looks at one’s risks and seeks to assess whether one’s existing policies adequately provide proper coverage for such areas that could include life, health, disability, long-term care, liability, home and automobile.
- **BUSINESS PLANNING:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at targeting your goals.
- **INVESTMENT ANALYSIS:** This may involve developing an asset allocation strategy to meet clients’ financial goals and providing information on investment vehicles and strategies across a client’s investment accounts. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **RETIREMENT PLANNING:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **TAX PLANNING STRATEGIES:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency”, with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may affect your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who

specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Clients purchasing this service will receive a report providing the client with an assessment and recommendations designed to help articulate and pursue his or her stated financial goals and objectives.

The client always has the right to decide whether or not to act upon our recommendations. If the client elects to act on any of the recommendations, the client always has the right to affect the transactions through anyone of their choosing.

### **Investment Management Services**

Once a client has a financial plan, we can provide implementation of that plan. Part of implementation includes managing individually tailored investment portfolios. D Street provides ongoing advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy, or an investment plan with an asset allocation target, and create and manage a portfolio based on that policy and allocation target. During our data-gathering and analysis process, we assess such things as the client's individual objectives, time horizons, risks, and liquidity needs. We may also seek to understand and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client and the investment policy developed for the client. Fees pertaining to this service are outlined in Item 5 of this brochure.

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

We offer the same suite of services to all of our clients. Anyone may engage D Street to develop a financial plan or special project work. However, a client must elect to engage D Street to implement the financial plan. Investment portfolio management is part of implementation, and is guided by the client's Investment Policy Statement, which is developed by the firm based on the client's key objectives and desires.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

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

---

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees and without penalty. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## Investment Management Services

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

Account Value*	Annual Advisory Fee
<b>First \$250,000</b>	1.25%
<b>Over \$250,000</b>	1.00%

\* For clients with accounts valued at \$450,000 or more, financial planning service is included in your AUM fees. For accts with AUM of less than \$450,000, the firm may charge a minimum service fee of \$250/hour for ongoing financial planning services.

These asset management fees are billed monthly in arrears based upon the ending balance (market value) of the account as determined by the Custodian on the last day of the month.

The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart, resulting in a combined weighted fee. For example, an account valued at an ending balance of \$750,000 during a given month would pay an effective monthly fee of \$677.08. In this example, the monthly fee is determined by the following calculation:  $((\$250,000 \times 1.25\%) + (\$500,000 \times 1.00\%)) \div 12 = \$677.08$ . No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are generally debited directly from client accounts. Accounts initiated or terminated during a billing period will be charged a pro-rated fee based on the number of days the account was open during the month. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

## Financial Planning

D Street offers comprehensive financial planning to its clients. Financial planning can be engaged as fixed fee or as hourly fee work. Financial planning consists of an upfront charge of 50% at the beginning of any financial planning work and the remaining 50% due at the delivery of the financial plan to the client.

### ***Fixed Fee***

Financial planning may be offered on a fixed fee basis and can range between \$1,500 and \$4,500, depending on the scope, complexity, and time required. The fixed fee will be agreed upon before the start of any work. The fee may be negotiable in some cases. After we have estimated the time and work involved, we use our hourly fee rate as a component for determining the fixed fee.

### ***Hourly Fee***

Hourly fees can also be arranged for financial planning and special projects at a rate of \$250 an hour. D Street will not bill an amount above \$500.00 more than 6 months in advance.

***D Street's Refund Policy:***

By delivering a written request with a minimum 14 days' advance notice to D Street, a client may terminate a fixed or hourly fee financial planning engagement. D Street reserves the right to terminate a client agreement at any time upon furnishing a notice to the client.

In the event of early termination, the client will be billed for the hours worked at a rate of \$250 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.

**Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as 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 fund 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 shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

---

We do not offer performance-based fees.

## Item 7: Types of Clients

---

D Street's target clients are individuals or couples, many of whom are of high net worth or are small businesses / small business owners. There is no requirement for opening or maintaining an account and there is no minimum account size.

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

---

D Street's general parameters in developing investment strategies for its clients are described in this section.

As explained in Section 4, each client's needs and desires are considered on an individual basis, rather than according to a one-size-fits-all approach to investing, and those individual factors are taken into account as well when designing an investment strategy for a specific client.

Material risks in investing include concentration of assets, lack of clarity and agreement on why investments are being made, lack of a disciplined investment process, and paying too much in taxes and fees. Our approach, as illustrated below, endeavors to mitigate these risks.

D Street develops with the client an Investment Policy Statement, which states the client's investment objectives, investment time horizon, current income needs, tax situation, and any other considerations unique to the client.

D Street places a high importance on diversification across all major asset classes. A core management belief is that recent performance is not an indication of future performance, but that the best portfolio is one built to last for full market cycles and is not short-term oriented.

Our strategy is an academically based, buy-and-hold approach, with a focus on asset allocation as a key component of investment portfolio design. We believe that the appropriate allocation of assets across diverse investment categories is critical to the long-term success of one's financial objectives. We recommend that the portfolio be maintained by rebalancing at least annually, or as other circumstances dictate. Rebalancing shifts a portfolio back toward a target allocation when particular asset classes become over- or underweighted relative to the others due to such things as differing asset performance or distributions made. This low turnover strategy also minimizes transaction costs and taxable events. The risk involved with this strategy is that the timing of rebalancing could be wrong in hindsight.

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because of tax efficient funds and/or minimal trading activity inside the portfolio).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio with the hope of generating returns that are greater than the broader market or a designated benchmark. Such efforts can create increased risk and costs.



D Street primarily invests clients' money in no-load mutual funds, although it on occasion, may utilize publically traded stocks or bonds (including tax exempt/municipals) and ETFs. The firm does not invest clients' money in derivatives, private placements, or hedge funds and will not trade on margin.

The firm can advise you about a variety of qualified retirement plans such as IRAs, SEPs, Profit Sharing Plans, TSAs (403b plans), and 401k plans. It also can advise you on nonqualified tax deferred plans.

## Material Risks Involved

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and micro market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Many other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation and Purchasing Power Risk:** Inflation and other circumstances may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

**IRA Rollover Considerations:** We may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation, regardless of whether the decision to enact a rollover is based on your needs. Additionally, the investment choices available to you in your employer's retirement plan may be lower cost than our services. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

## Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client may incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

## Item 9: Disciplinary Information

---

No disciplinary actions – civil or criminal – have ever been initiated against D Street Financial or Stacy Gary.

## Item 10: Other Financial Industry Activities and Affiliations

---

No D Street employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No D Street employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

D Street does not have any related parties. As a result, we do not have a relationship with any related parties. During the course of financial planning, where a 3<sup>rd</sup> party expert, such as a tax, insurance, or estate planning specialist, is required and may be referred, D Street does not have a material interest in that 3<sup>rd</sup> party that would create a material conflict of interest with clients.

D Street only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

---

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

### **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.

- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

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

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. Our policy is designed to assure that the personal securities transactions, activities and interests of the employees of our firm 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. 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. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

### **Trading Securities at/Around the Same Time as Client's Securities**

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities prior to the same security for clients on the same day.

## Investment Advice Relating to Retirement Accounts

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 with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

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

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

## Item 12: Brokerage Practices

---

### Factors Used to Select Custodians and/or Broker-Dealers

D Street does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

#### 1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

#### 2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. Directed Brokerage

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients' money over using a lower-cost custodian.

### Aggregating (Block) Trading for Multiple Client Accounts

We do not engage in block trading, the process of aggregating or batch trading of securities. Block trading may create less expensive trading costs for client accounts. However, because we approach each client as a unique scenario with individualized holding and investment it is our trading policy is to implement all client orders on an individual basis. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings may vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

## Item 13: Review of Accounts

---

Client accounts with the Investment Management Service will be reviewed regularly on a periodic basis by Stacy Gary. The account is reviewed with regards to the client's investment policy statement and the client's financial goals. It is the client's responsibility to notify D Street of any changes relevant to their financial plan, including goals, investing objectives, financial situation, or wishes to request reasonable restrictions around D Street's discretionary management services. In addition to periodic reviews, we may conduct ad-hoc account reviews for reasons that could include such things as large deposits or withdrawals from a client's account or changes in a client's goals or timeframes.

Clients will receive statements from their custodian on at least a quarterly basis.

In the course of ongoing, periodic reviews with clients, D Street may provide clients with financial planning reports, updated commentary and recommendations, or other reports. For investment management service portfolios, D Street will not provide performance reports to investment management clients.

## Item 14: Client Referrals and Other Compensation

---

We do not compensate anyone outside the firm directly or indirectly for any services offered to clients. Similarly, we do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Client referrals are welcome and encouraged from existing clients and other professionals though compensation is not made for referrals.

## Item 15: Custody

---

D Street does not accept custody of client funds, however it is deemed to have limited custody solely with its ability to withdraw fees from clients' accounts. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account

statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client account(s) in which D Street directly debits its advisory fee:

- i. D Street will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account(s), including the amount of the advisory fee.
- iii. The client will provide written authorization to D Street, permitting it to be paid directly from their account(s) held by the custodian.

## Item 16: Investment Discretion

---

Our investment management services are provided under a discretionary authority, which enables us, on your behalf, to implement investment decisions without requiring your authorization for each transaction. This discretionary authority enables such things as placing trade orders to buy or sell securities and deducting advisory fees.

## Item 17: Voting Client Securities

---

D Street does not vote client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

---

D Street has no financial commitment that impairs the firm's ability to meet contractual and fiduciary commitments to clients. The firm has not been the subject of a bankruptcy proceeding.

D Street does not have custody of client funds or securities or nor do not require the prepayment of fees of more than \$500 six months or more in advance.

# Item 19: Requirements for State-Registered Advisers

---

The information on D Street's principal executive officer, Stacy Gary, is included in his respective Brochure Supplement (Part 2B of Form ADV).



# Privacy Notice

---

In the normal course of business, in order to deliver products and/or services to clients, financial companies, including D Street, collect and may need to share clients' information to non-affiliated third parties. Non-affiliated third-parties include service providers that perform services on our behalf or on your behalf. Examples of such providers may include accountants, attorneys, consultants, clearing and custodial firms, and technology companies. Law enforcement and government authorities are also non-affiliated third-parties.

Clients' collected information may include non-public, personal information (that is, information that may not be publically available). D Street recognizes the importance of protecting clients' personal information and privacy. The following is designed to help you understand what information D Street collects from you and how D Street uses that information to serve your account.

## **Categories of Information D Street May Collect.**

D Street may collect personal financial and account information from such sources as information relating to services or transactions performed for or entered into on behalf of clients and data or analyses derived from non-public, personal information. Collected information may include data (such as name, address, social security number, date of birth, income, phone number, e-mail address, and other relevant information) that you provide on documents and forms, data about your transactions with D Street (such as the types of investments you have made and your account status), or other information or documentation you provide.

## **Policy: How D Street Uses Your Information.**

Without a client's prior notice and consent, unless otherwise required by law, D Street does not share any non-public personal information it has collected, such as that described above, with any non-affiliated third parties, except in the following circumstances:

- D Street may disclose client information to un-affiliated third party service providers involved in servicing and administering products and services on your behalf.
- To offer or market products and services to you.
- As required by regulatory authorities or law enforcement officials who have jurisdiction over D Street, or as otherwise required by any applicable law; and
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

The same privacy policy also applies to former clients.

## **Confidentiality and Security**

D Street restricts access to nonpublic personal information about its clients to those employees and agents who need to know that information to provide clients with products and services. D Street maintains physical, electronic and procedural safeguards to protect its clients' non-public personal information. These include safeguards such as computer passwords, secured files, and locked buildings.

D Street respects and values the fact that you have entrusted us with your private financial information, and we will work diligently to maintain that trust. We are committed to preserving that trust by respecting your privacy as provided herein.

If you have any questions regarding this privacy notice, please contact us.

D Street Financial LLC

(352) 321-2899

Dated March 8, 2022

## Form ADV Part 2B – Brochure Supplement

---

*For*

**Stacy Gary**

Director of Financial Planning, and Chief Compliance Officer

This brochure supplement provides information about Stacy Gary that supplements the D Street Financial LLC (“D Street”) brochure. A copy of that brochure precedes this supplement. Please contact Stacy Gary if the D Street brochure is not included with this supplement or if you have any questions about the contents of this supplement. Stacy Gary is licensed as an Investment Adviser Representative in Florida.

Additional information about Stacy Gary is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6599165.

## Item 2: Educational Background and Business Experience

---

### Stacy Blair Gary

Born: 1970

#### Educational Background

- 1993 – Bachelor of Arts, Westmont College
- 1997 – Master of Arts, San Francisco State University
- 2009 – Master of Business Administration, University of Washington, Foster School of Business

#### Business Experience

- 09/2021 – Present, D Street Financial LLC, Director of Financial Planning and CCO
- 10/2019 – 07/2021, Mutual Trust Advisory Group, Financial Advisor
- 07/2017 – 03/2019, Illuminate Financial, Financial Advisor
- 03/2015 – 10/2019, Independent Management Consultant
- 03/2010 – 03/2015, Accenture, Management Consultant

#### Industry Exams

Mr. Gary passed the Series 65 exam in 2015.

## Item 3: Disciplinary Information

---

Stacy Gary does not have a disciplinary history to report.

## Item 4: Other Business Activities

---

Stacy Gary is not involved with outside business activities.

## Item 5: Additional Compensation

---

Stacy Gary does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through D Street.

## Item 6: Supervision

---

Stacy Gary, as Director of Financial Planning and Chief Compliance Officer of D Street, is responsible for supervision and supervises personnel and the investments made in client accounts. Stacy Gary monitors the investments to ensure they are suitable for the client and consistent with their investment needs, goals, objectives and Investment Policy Statement, as well as any restrictions previously requested by the client. He may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

---

Stacy Gary has NOT been found liable in an arbitration, civil, self-regulatory, or administrative proceeding, and has not been the subject of a bankruptcy petition.