

Form ADV Part 2A Brochure

June 5, 2026



Gulfoast

(Legal Entity:

Website: <http://>

This Brochure
Advisors. If you
john@gulfoast.com
States Securities

Gulfoast Emb
as an investme
Embers Adviso

This is only a draft. The advisor's registration is pending with the State of Florida. No offering of investment advice nor any solicitation of compensation is made.

Embers
7-319-1769 or
d by the United

. Registration
out Gulfoast



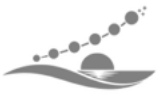
GULFCOAST
EMBERS
ADVISORS

3130 Chandler Lane, North Port, FL 34286



Material Changes

This is the initial filing of Gulfcoast Embers Advisors' Form ADV Part 2A.
There are no material changes to report.



ADVISORY BUSINESS.....	4
FEES AND COMPENSATION.....	4
PERFORMANCE-BASED FEES.....	5
TYPES OF CLIENTS.....	5
METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK.....	5
DISCIPLINARY INFORMATION	6
OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS.....	6
CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING	6
BROKERAGE PRACTICES.....	7
REVIEW OF ACCOUNTS.....	7
CLIENT REFERRALS & OTHER COMPENSATION	8
CUSTODY	8
INVESTMENT DISCRETION	8
VOTING CLIENT SECURITIES	8
FINANCIAL INFORMATION	8

Advisory Business

Firm Overview

Gulfcoast Embers Advisors (“the firm”) is a state-registered investment adviser located in North Port, Florida. The firm provides fee-only investment advisory and financial planning services to individuals.

Fiduciary Duty

The firm acts as a **fiduciary** to all clients. The firm is obligated to act in the best interest of clients at all times and to place client interests ahead of its own.

Ownership

The firm is wholly owned and

Services Offered

The firm provides:

- Discretionary portfolio
- Non-discretionary inve
- Suitability reviews (ev
their risk tolerance, liq
meeting where materia
- Portfolio rebalancing
- General financial guida
- Optional retainer-base

Regulatory Assets Under Ma

As of the June 5, 2026, the firm
Regulatory assets under mana

Fees and Compen

AUM Fee

The firm charges an annual as

- **1.00%** on assets up to
- **0.75%** on assets betwe
- **0.50%** on assets betwe
- **0.20%** on assets over \$

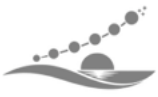
Fees are **calculated using a blended rate**, meaning each portion of the portfolio is billed at the rate applicable to that tier. Fees are **billed monthly in arrears** based on the month-end balance. Fees are prorated for deposits and withdrawals made during the billing period.

Clients who opt for the AUM Fee will have access to all services offered by the firm and will not incur other fees to this firm.

Retainer Fee (Alternative to AUM Fee)

Clients may choose a **flat annual retainer** billed in arrears on a monthly basis instead of an AUM fee. Negotiated retainers range from **\$1,500 to \$15,000** depending on the complexity of client service needs. Generally, negotiated retainers will exceed 1% of assets under advisement at the time of signing a contract

This is only a draft. The advisor’s registration is pending with the State of Florida. No offering of investment advice nor any solicitation of compensation is made.



unless the client
amendments

This arrangement

- Have
- addit
- Prefe
- Do n
- May
- long

Examples:

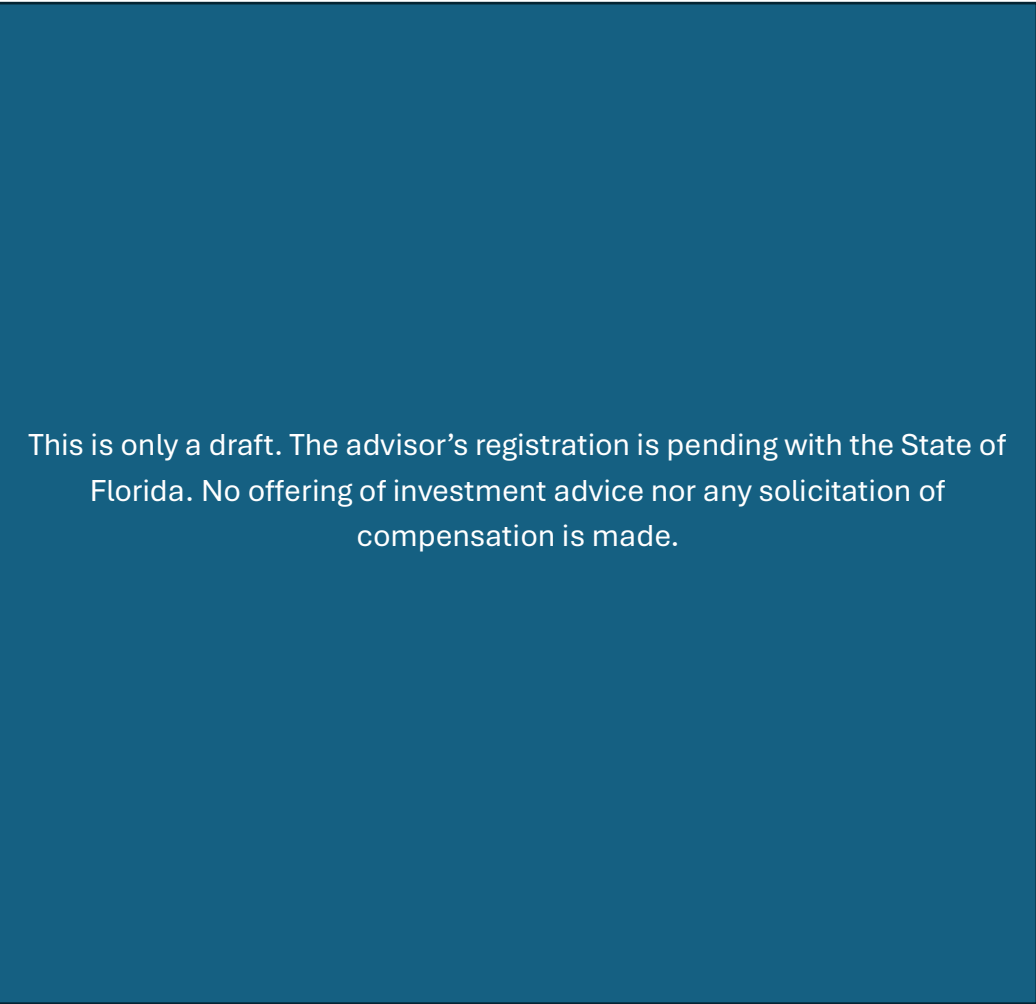
- A cli
- quart
- 1% A
- A cli
- exter
- falls

Financial plan
billed separa

Hourly Adv

Occasionally
commitment
increments.

payment for the first hour covers services delivered immediately and does not trigger custody.



This is only a draft. The advisor's registration is pending with the State of Florida. No offering of investment advice nor any solicitation of compensation is made.

ings may require

geted areas where
(balancing)

st-effective in the

ly seeking
it is cheaper than a

requires more
retainer fee that

ments and are not

tractual
ed in **15-minute**
The advance

Any additional time beyond the first hour is billed **after the service is completed**. If the client does not use the full initial hour, the firm does not charge an additional minimum for subsequent engagements. All time spent on client matters—including research, portfolio analysis, email responses, and related advisory work—is billable.

Clients selecting **either** the AUM fee **or** the retainer will not incur hourly advisory fees.

Other Fees

Clients may incur custodial fees, mutual fund expenses, ETF expenses, and transaction costs charged by the custodian. The firm does not receive commissions or third-party compensation.

Performance-Based Fees

The firm does **not** offer performance-based commitments nor charge performance-based fees.

Types of Clients

The firm provides services to individuals, families, and trusts. A minimum account size of \$25,000 per household applies for AUM services. The minimum account size may be waived at the Advisor's discretion.

Methods of Analysis, Investment Strategies & Risk

The firm uses:

- Fundamental analysis
- Technical analysis
- Strategic and tactical asset allocation
- Diversification and risk-based portfolio construction

The firm's investment philosophy emphasizes long-term discipline, strategic planning, and broad diversification. Portfolios are constructed to align with each client's objectives, risk tolerance, and time horizon, with an emphasis on capital preservation, growth, and tax efficiency as appropriate. The firm seeks to limit single-security risk by encouraging diversified exposure across asset classes, sectors, and geographies. Tactical adjustments may be made when market conditions warrant, but the firm generally prioritizes consistency and long-term allocation discipline over short-term market timing. Investing involves risk, including loss of principal. Risks include market risk, interest rate risk, credit risk, equity volatility, inflation risk, and other economic factors. Tactical allocation strategies involve the risk that the firm's judgment about short-term market movements may be incorrect.

Rebalancing Approach

The firm monitors client portfolios on an ongoing basis and performs rebalancing as needed to maintain alignment with each client's target asset allocation. Rebalancing may occur on a periodic basis—typically monthly or quarterly for discretionary accounts—or when portfolio drift exceeds the firm's internal thresholds. Rebalancing may also be triggered by significant market movements, changes in a client's financial situation, material deviations from target allocations, or tax-related considerations. Retainer clients may receive rebalancing recommendations, but rebalancing is only implemented when specifically authorized by the client.

Disciplinary Information

The firm and its supervised persons have **no reportable disciplinary history**.

Other Financial Industry Activities & Affiliations

The firm is not currently engaged in any other financial industry activities. In the future, the firm may offer insurance solutions or basic tax preparation. If so, the firm will update this Brochure and provide required disclosures.

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

The firm maintains a written Code of Ethics requiring:

- Acting in clients' best interests
- Avoiding or disclosing conflicts
- Maintaining confidentiality
- Compliance with securities laws

Personal Trading Policy

The firm:

- Requires **pre-clearance** of personal trades
- Requires **quarterly transaction reports**



- Requires **annual holdings reports**
- Prohibits **trading ahead of clients**
- May trade the same securities as clients, subject to restrictions

The firm does not act as principal or broker in client transactions.

Brokerage Practices

Custodian Recommendation

Custodial availability is pending. The firm recommends **Charles Schwab** as custodian. Upon compliance review and approval from Schwab, and unless the firm offers alternative custodians in the future, Gulfcoast Embers Advisors, LLC will generally require AUM clients to use Schwab to provide a consistent client experience.

Retainer clients managing trades within their portfolio independently may use other custodians, but doing so may limit the firm's ability to provide certain services and is not recommended.

Best Execution

The firm seeks best execution based on overall value, not lowest cost.

Non-Cash Economic Benefits from the Custodian

Upon compliance approval, Schwab may provide technology, research tools, and support services. These benefits create a potential conflict, which the firm mitigates through its fiduciary duty. Schwab does not charge the firm for these services; however, these benefits are generally available to all independent investment advisers who custody client assets with Schwab and are not based on the amount of assets the firm places with Schwab. These benefits are not considered soft dollars under Section 28(e) because the firm does not direct brokerage in exchange for research. Examples of Non-Cash Benefits Provided by Schwab:

- Access to Schwab's trading platform and account management software
- Research, market data, and educational materials
- Practice management resources
- Technology support and integration assistance
- Compliance, legal, or business consulting materials
- Educational conferences, webinars, and workshops
- Discounts on third-party software or services
- Access to Schwab service teams and transition support

Trade Aggregation

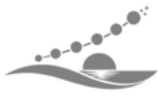
The firm may aggregate trades when beneficial. All clients receive the same average price.

Trade Errors

In the event of a trade error, the firm will correct the error promptly and ensure the client is not disadvantaged.

Review of Accounts

- All accounts reviewed **quarterly at minimum**
- Discretionary AUM accounts reviewed **monthly at minimum**
- Additional reviews triggered by market events, client changes, deposits/withdrawals, tax considerations, or tactical opportunities.



- Reviews conducted by a registered investment adviser representative
- Clients receive account statements directly from the qualified custodian, typically Charles Schwab and detailed invoices for all fee deductions, including calculations for each fee at the time of deduction. Additional client specific reports, i.e. Client Investment Policy Statements, portfolio analysis, etc. generated by the firm are available upon request

Client Referrals & Other Compensation

The firm does not currently pay or receive referral fees. In the future, the firm may engage solicitors. Any such arrangement will include:

- Written solicitor agreements
- Required solicitor disclosures
- No increase in client fees

Custody

The firm does **not** maintain custody of client assets aside from fee deduction. The firm does not accept prepayment of more than \$500 per client more than six months in advance. Any future insurance or tax-prep service fees will be paid **directly by clients**, not deducted from investment accounts unless permitted without triggering custody.

Investment Discretion

The firm accepts **ongoing discretionary authority** for AUM clients when written approval is provided, including:

- Security selection
- Trade timing
- Position sizing
- Rebalancing on a Monthly or Quarterly basis, or due to significant gains in an asset
- Model implementation

Retainer clients generally do **not** receive ongoing discretionary services but may authorize **one-time discretionary actions** i.e. select a security with a given risk profile and invest \$xxx this week. Such authorization must be provided in writing (email is acceptable) and applies only to the specific transaction authorized.

Voting Client Securities

The firm does **not** vote proxies. Clients receive proxies directly from Schwab. The firm may provide guidance upon request but does not act on clients' behalf.

Financial Information

The firm:

- Does **not** require prepayment of more than \$500 more than six months in advance
- Has **no financial condition** impairing its ability to serve clients
- Has **never** been the subject of a bankruptcy petition