

**Item 1 – Cover Page**

**SunStreet Securities, LLC**

10320 W. McDowell Rd., Suite F-6018, Avondale, AZ 85392

**800-823-1822**

**SunStreetSecurities.com**

**03-31-2023**

This Brochure provides information about the qualifications and business practices of SunStreet Securities, LLC. If you have any questions about the contents of this Brochure, please contact us at 800-823-1822. 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.

SunStreet Securities, LLC is an investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about SunStreet Securities, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated 03-31-2023 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information.

There are no specific material changes made to this Brochure from the last annual update of our brochure dated 03-31-2022.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested, free of charge, by contacting your advisor or Mike Haddad/CCO at 800-823-1822 or mhaddad@sunstreetsecurities.com.

Additional information about SunStreet Securities, LLC is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with SunStreet Securities, LLC who are registered, or are required to be registered, as investment adviser representatives of SunStreet Securities, LLC.

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#### **Item 4 – Advisory Business**

SunStreet Securities, LLC has been conducting investment supervisory services for more than thirteen years. SunStreet Securities, LLC was founded and is owned by Mr. Mike Haddad. SunStreet Securities, LLC provides investment supervisory services primarily to individual clients. Assets for client accounts are managed on an individualized basis using diversified portfolios. Investment management and advice is tailored to the specific investment of each client to achieve the investment goals and objectives of the client. SunStreet Securities, LLC receives a fee based upon a percentage of the market value of assets under management. Basic Fee schedules and basis of computation for various types of investment supervisory accounts can be found under Item 5. As of the date of this brochure, SunStreet Securities, LLC manages 5.3 million on a non-discretionary basis using various mutual funds and other various securities.

SunStreet Securities, LLC provides financial planning and consulting related services as part of SunStreet's overall advisory services. Information gathered in this context allows SunStreet to implement its portfolio management services in accordance with client's stated goals and objectives. SunStreet may also provide asset review services and provide clients with written financial plan on a fixed fee or hourly basis.

SunStreet Securities, LLC may refer its clients to various registered third-party investment advisors ("TPAs") for asset management services. SunStreet Securities, LLC or an advisor member of SunStreet, after gathering information about a client's financial situation and investments goals and objectives, may assist the client in selecting a particular TPA's program. SunStreet Securities, LLC will receive compensation pursuant to its agreements with these TPAs for introducing clients to the TPA and for ongoing services provided to the client. SunStreet uses a number of factors in determining which TPAs to refer clients to including, but not limited to, performance, investment objectives, fees, and methods of analysis. SunStreet Securities, LLC may show a preference in referring clients to TPAs with which SunStreet has a referral agreements over TPAs with which it has no referral agreements.

Services rendered by TPAs and fees paid by the client to TPAs are established and payable in accordance with Form ADV Part II or other equivalent disclosure document provided by each TPA to whom SunStreet Securities, LLC refers its clients, and may or may not be negotiable. Clients will be required to sign investment advisory agreements with the TPA of the program selected. The client or TPA may terminate the advisory relationship in accordance with provisions of the investment advisory agreements.

## Item 5 – Fees and Compensation

All fees are subject to negotiation. Standard Annual Management Fee Schedule for actively managed accounts by SunStreet Securities, LLC is as follows:

Assets Under Management	Standard Annual Fee
\$ 25,000 - 250,000	2.75%
\$ 250,001 - 750,000	2.50%
\$ 750,001 - 2,000,000	2.00%
\$ 2,000,000 +	1.50%

Annual advisory fees of more than 2.00% of assets under management are above industry standards. Other investment advisors may provide the same or similar services at lower rates. Fees are subject to negotiation, fees of more than 2.00% may be agreed on based on the client's amount of assets, financial complexity, and overall services needed. SunStreet Securities, LLC may agree to actual fees which vary from its standard scheduled fees. The actual Fees charged to each client will be stated in the client's Advisory Agreement.

SunStreet may also provide asset review services and provide clients with written financial plan based on an hourly billing rate of \$100 per hour, or based on an annual flat fixed fee of \$200 to \$5000 based on the client's amount of assets, financial complexity, and overall services needed. These fees may be negotiable based on the client's situation and circumstances and may be less or more than the above stated fees and can result in fees that are above industry standards by which other investment advisors may provide the same or similar services at lower rates. The actual Fees charged to each client will be stated in the client's Advisory Agreement.

The specific manner in which fees are charged by SunStreet Securities, LLC is established in a client's written agreement with SunStreet Securities, LLC. SunStreet Securities, LLC will generally bill its fees on a monthly/or quarterly basis. Clients may elect to be billed in advance or arrears each calendar month/ or quarter. Clients may also elect to be billed directly for fees or to authorize SunStreet Securities, LLC to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Fees will be based upon month-end market value measured at the beginning, during, and or at the end of the month/or quarter, as valued in good faith by the custodian holding the client's funds and securities and reflected on client account statement. Client will receive notification of the payment of all Fees on the client's

periodic account statement. Clients accounts are generally appraised for fee purposes monthly/or quarterly and expressed on an annual basis.

Client will have five business days after execution of the Advisory Agreement to terminate the Agreement without penalty and receive a full refund of fees paid, if any. Accounts initiated or terminated during a calendar month/ or quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

SunStreet Securities, LLC fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, brokers dealers, third party investment 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 SunStreet Securities, LLC fee.

SunStreet Securities, LLC is an investment advisor and also registered as a broker dealer. Commissions provide primary compensation for SunStreet Securities, LLC. SunStreet Securities, LLC receives compensation in connection with the purchase or sale of securities or other investment products, including asset-based transaction fee or commission or service fees from the sale of mutual funds. This practice may present a conflict of interest and gives SunStreet Securities, LLC and representatives of SunStreet an incentive to recommend investment products based on the compensation received, rather than on a client's needs. SunStreet Securities, LLC primarily recommend mutual funds and purchases each mutual fund at the fund's Net Asset Value (NAV), clients do not pay the sales charges when the funds are purchased at NAV for an asset-based account, SunStreet Securities, LLC recommend "no-load" funds or load funds purchased at the NAV.

In general, SunStreet Securities, LLC does not accept compensation in the form of commissions, markups, or sales charges for asset-based accounts. SunStreet Securities, LLC may accept compensation related to trade executions and clearing, service fees and transaction fees from selling mutual funds or other securities. Clients have the option to purchase investment products that SunStreet Securities, LLC recommend through other brokers or agents that are not affiliated with SunStreet Securities, LLC.

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

Services rendered by TPAs and fees paid by the client to TPAs are established and payable in accordance with Form ADV Part II or other equivalent disclosure document provided by each TPA to whom SunStreet Securities, LLC refers its clients, and may or may not be negotiable.

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

SunStreet Securities, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

SunStreet Securities, LLC mainly provides portfolio management services to individuals, and high net worth individuals. SunStreet Securities, LLC, as a general rule, accepts accounts with assets of \$25,000 or greater. The Firm, at its discretion, may at times accept smaller accounts than its stated minimum.

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

SunStreet Securities, LLC uses various methods of security analysis, including but not limited to, fundamental, technical, and cyclical methods. SunStreet Securities, LLC offers advice on various types of equities, bonds, and Investment company securities. Mutual funds are the primary type of investments offered.

Investment in mutual funds could lose money over short or even long periods. Mutual funds are offered and sold by prospectus. Fund's Prospectus contains information regarding investment objective, risks, and charges and expenses and other information that should be read and considered carefully before investing. Investing in securities involves risk of loss that clients should be prepared to bear.

### **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 SunStreet Securities, LLC or the integrity of SunStreet's management. SunStreet Securities, LLC has no information applicable to this Item.

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

SunStreet Securities, LLC is an investment advisor. SunStreet Securities, LLC is also registered as a securities broker dealer and is limited to securities offered through SunStreet, other suitable securities and investment products may be available through other broker dealers with comparable services that may be available for more or less.

SunStreet Securities, LLC and its officers and advisor representatives, as licensed registered representatives with the broker dealer and as insurance agents or brokers of various insurance companies, are able to engage in securities and insurance transactions for advisory clients. Advisory clients, when considering implementation of advisory recommendations, are not under any obligation to engage these individuals. The implementation of any or all recommendations is only at the discretion of the advisory client after disclosure of conflicts of interest in recommending transactions in which these individuals may earn separate, yet customary compensation.

### **Item 11 – Code of Ethics**

SunStreet Securities, LLC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things.

SunStreet Securities, LLC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which SunStreet Securities, LLC has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which SunStreet Securities, LLC, its affiliates and/or clients, directly or indirectly, have a position of interest. SunStreet Securities, LLC employees and persons associated with SunStreet Securities, LLC are required to follow SunStreet's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of SunStreet Securities, LLC and its



affiliates may trade for their own accounts in securities which are recommended to and/or purchased for SunStreet's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of SunStreet Securities, LLC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of SunStreet's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between SunStreet Securities, LLC and its clients.

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

SunStreet Securities, LLC clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Mike Haddad or the advisor representative.

It is SunStreet's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. SunStreet Securities, LLC will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker dealer or has an affiliated broker dealer.

## **Item 12 – Brokerage Practices**

SunStreet Securities, LLC or any related person does not have authority to determine, without obtaining specific client consent, the broker or dealer to be used or commission rates paid. SunStreet Securities, LLC or any related person do not suggest brokers to clients.

SunStreet Securities, LLC or any related person does not have any arrangements where it is paid research or other products or services other than execution from a broker dealer or a third party in connection with client securities transactions. SunStreet Securities, LLC or any related person does not directly or indirectly compensates any person who is not a supervised person by SunStreet for client referrals.

SunStreet Securities, LLC is an investment advisor. SunStreet Securities, LLC is also registered as a securities broker dealer and is limited to securities offered through SunStreet, other suitable securities and investment products may be available through other broker dealers with comparable services that may be available for more or less.

## **Item 13 – Review of Accounts**

Client accounts are monitored on a continuous basis with a review conducted at least quarterly by a designated investment manager. The review is triggered by examining monthly and quarterly account transactions, statements, and other reports. More frequent reviews may also be triggered by material changes in the client's financial condition and circumstances, client request, portfolio holdings, rate of return, or unusual market activity.

Account custodian will send clients regular reports which will include monthly or quarterly statements of portfolio holdings and records of fees and transactions effected.

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

SunStreet Securities, LLC or any related person does not directly or indirectly compensates any person who is not a supervised person by SunStreet for client referrals.

### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer's qualified custodian that holds and maintains client's investment assets. SunStreet Securities, LLC urges you to carefully review such statements.

### **Item 16 – Investment Discretion**

SunStreet Securities, LLC or any related person does not accept discretionary authority to manage securities accounts on behalf of clients.

### **Item 17 – Voting *Client* Securities**

As a matter of firm policy and practice, SunStreet Securities, LLC does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. SunStreet Securities, LLC may provide advice to clients regarding the clients' voting of proxies.

### **Item 18 – Financial Information**

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

### **Item 19 – Requirements for State-Registered Advisers**

The principal executive officer who determines the Firm's overall business policies:

Mike S. Haddad, Born 1962

Education: California State University, Fullerton (BA, Finance - 1992)

Business Background: From 2007 to Present: Chief Compliance Officer of SunStreet Securities, LLC. From 1997 until 2005: Mr. Haddad was the President of Quest Capital Strategies, Inc. Mr. Haddad held other positions with Quest as Trader, Compliance Officer, and Chief Compliance Officer.