



LOCKE ADVISORY SERVICES

WEALTH MANAGEMENT, FINANCIAL PLANNING & TAX
LIFE WITH VISION & CLARITY

Form ADV Part 2 Brochure

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This Brochure provides information about the qualifications and business practices of Locke Advisory Services LLC. If you have any questions about the contents of this Brochure, please contact Art Locke at 571-271-5125 or alocke@lockeadvisory.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Locke Advisory Services LLC is also available on the SEC's website at <http://www.adviserinfo.sec.gov>. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Locke Advisory Services is 286132.

Item 2 - Material Changes

There are no material changes to disclose in this item.

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Item 4 – Advisory Business

Locke Advisory Services LLC (“Locke Advisory Services”, the “Firm”, “We” or “Our”) was formed in January 2017 to provide independent wealth management, personal financial planning and tax services to individuals, trusts and businesses. Our umbrella of service offerings provides the foundation for guidance and recommendations based on a comprehensive view of our client’s financial affairs.

The core value of our Firm is our commitment to work in the best interests of the clients we serve. We are dedicated to building trusted, objective and long-term relationships with our clients. We do this by providing independent, personalized, knowledgeable and comprehensive offerings with the highest degree of integrity and customer service. As an independent, fee-only advisor, the Firm does not receive any sales-related compensation (commissions, bonuses or fees) in connection with any professional services provided to clients or related to the purchase or sale of securities by clients. We do not receive any such compensation related to insurance or other products recommended to and purchased by our clients.

The founder and sole owner of Locke Advisory Services is Arthur S. Locke, III, CPA/PFS, CFP®. Mr. Locke received his Certified Public Accountant (“CPA”) certification in May 1988 and is a licensed CPA in the State of Virginia. In July 2018, Mr. Locke passed the CFP® Certification Examination administered by the CFP Board and became a CFP® in December 2019. In June 2017, Mr. Locke passed the Personal Financial Specialist (“PFS”) Exam and become a credentialed CPA/PFS. The PFS credential is administered by the Association of International Certified Public Accountants (“AICPA”) and is only available to CPAs. Mr. Locke passed the Series 65 Uniform Investment Advisor Law Examination in December 2016.

From September 2011 through December 2016, Mr. Locke was a private investor performing fundamental and technical research for his family accounts, investing in a wide range of mutual funds and publicly traded equities.

From 1994 to 2011, Mr. Locke worked in an executive capacity for five publicly-traded companies, including Chief Financial Officer (“CFO”) for three. Mr. Locke served as Senior Vice President and CFO of Websense Inc. from July 2009 to September 2011. Mr. Locke served in several executive positions for MicroStrategy Incorporated from January 2001 to March 2009, including Executive Vice President and CFO from January 2005 to March 2009. In 2006 during his tenure at MicroStrategy, Mr. Locke was a top-five finalist for the 2006 Greater Washington Technology Council Public Company CFO of the Year. Mr. Locke started his career with the CPA firm Touche Ross & Co (now Deloitte), and later joined the CPA firm Coopers & Lybrand (now PwC).

Mr. Locke received a Bachelor of Science in Business Administration from American University in May 1986, with a double major in accounting and computer systems.

Investment Advisory Services

Locke Advisory Services manages investment portfolios for individuals, trusts and businesses. Locke Advisory Services works with each client to determine the client's investment objectives, time horizons and risk tolerance. As part of this process, the Firm also considers each client's cash flow needs, investment philosophy, asset allocation style, unique circumstances and tax attributes. This information forms the basis for designing a written investment policy statement and identifies any reasonable restrictions the client may impose on investing in certain securities or certain types of securities. The completed investment policy statement includes an asset allocation strategy suitable for each client's investment objectives. Once the client has signed-off on the investment policy statement, the Firm begins the implementation of the investment plan.

Locke Advisory Services evaluates each new client's existing investment portfolio. If a change in the client's asset allocation strategy is deemed to be in the client's best interests, a plan is developed to transition from their existing portfolio to the desired portfolio. Depending upon the extent of change required to implement each client's asset allocation strategy and other factors including economic conditions, market factors and tax implications, it may take several quarters and, in some cases, more than a year to transition a new client's account to the intended asset allocation strategy. We work closely with each client to periodically review investment performance and asset allocation. We use periodic meetings to determine if any significant events have occurred that would give rise to a need to update the client's investment policy statement and asset allocation strategy.

Locke Advisory Services will typically recommend and create a portfolio of stocks, mutual funds and/or exchange-traded funds ("ETF" or "ETFs"). The Firm's recommendations are intended to be consistent with the client's investment policy statement, taking into consideration investment suitability, asset allocation, investment style and the client's financial condition.

As of December 31, 2024, Locke Advisory Services had regulatory assets under management of \$52,202,168, all of which was managed with discretion.

Personal Financial Planning

Locke Advisory Services' personal financial planning business seeks to assist individuals and families with managing their financial resources to plan for retirement, educational needs, important events, major purchases and other critical family requirements. These services may be provided for an additional fee and compliment the Firm's investment advisory and tax services.

The financial planning process typically starts with gathering data, including an in-depth review of each client's resources, goals, time horizons, objectives, cash flow needs and risk tolerance. After review and analysis of information collected, a written financial plan is prepared and reviewed with the client. The plan typically addresses present and forecasted client resources and obligations, and may include a combination or all of the following areas: income, savings, investments, return on investments, employee benefits, tax implications, insurance, retirement planning, family educational needs, key life events, financial goals, life goals, major purchases and other matters important to the individual or family.

The client's financial plan usually includes general recommendations for a course of activity or specific actions to be taken. For example, recommendations may be made that the client establish an education savings account, an emergency fund, revise employee benefits, obtain or revise insurance coverage, increase retirement savings, change investment asset allocation or implement a budgeting process. Should a client choose to implement the recommendations in the plan, Locke Advisory Services suggests that the client work closely with his/her attorney, accountant or insurance agent throughout the process. Implementation of financial planning recommendations is entirely at the client's discretion.

A client's financial plan may address any or all of the following areas:

- **Financial Tools:** Implementation of personal finance software and tools for tracking and analyzing spending, budgeting, investments, net worth, debt reduction and financial goals.
- **Education Savings:** Internal Revenue Code ("IRC") section 529 plans, financial aid, grants and assistance in preparing to meet dependent's continuing educational needs.
- **Tax Planning:** Tax planning and analysis on income, spending and investment allocation.
- **Death, Disability:** Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- **Retirement:** Income, expense and distribution forecasting and analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- **Investments:** Analysis of investment alternatives, suitability and their effect on a client's portfolio and anticipated future asset appreciation.
- **Personal:** Record keeping, personal liability, risk management, estate information and financial goals.

Tax Services

Locke Advisory Services provides tax planning and preparation services for individuals and small businesses. These services are provided for an additional fee and compliment the Firm's investment advisory and personal financial planning services.

The Firm's individual and small business tax services include tax planning, preparation and analysis of federal and state tax forecasts, preparation and analysis of quarterly tax estimates and returns, analysis of the timing of income and deductions, marginal tax analysis, and federal and state income tax preparation, review and filings.

Item 5 – Fees and Compensation

Investment Advisory Fees

<u>Assets Under Management</u>	<u>Fee Schedule</u>
First \$500,000	1.00%
Next \$500,000	0.90%
Next \$2,000,000	0.70%
Next \$2,000,000	0.50%
\$5,000,000 and higher	0.40%

The Fee Schedule reflects annual rates. Clients are generally billed quarterly in advance.

Investment advisory clients who are age 70 or older, receive a 10% discount off all services provided by the Firm. The Firm charges a minimum quarterly investment advisory fee of \$750 for clients 30 years of age or older. Under the Firm’s Young Investor program, our minimum quarterly fee is \$400 for clients who have not reached the age of 30. Our fee may be negotiable depending on the nature, extent and complexity of services.

As an independent, fee-only advisor, the Firm does not receive sales-related compensation (commissions, bonuses or fees) in connection with professional services provided to clients or related to the purchase or sale of securities by clients. Our investment advisory fee is the only compensation we receive for investment advisory services.

As part of Locke Advisory Services’ commitment to provide integrated services, investment advisory clients paying more than our minimum fee earn a 10% quarterly non-refundable credit towards personal financial planning and tax services. The non-refundable credit is good for 1 year from the date earned. For example, if a client’s investment advisory fee for the quarter ended March 31, 2023 is \$2,000, the client will earn a \$200 credit towards personal financial planning and tax services through March 31, 2024. Any unused, unexpired non-refundable credit is forfeited upon termination of the investment advisory services agreement. The Firm also offers 4 hours of complimentary personal financial planning services for each new investment advisory client.

While the Firm provides these integrated services to its investment advisory clients, there is no requirement for investment advisory clients to use these services. If clients choose not to use these services, there is no impact on our client’s investment advisory services fee. Further, the Firm will gladly work with accountants, legal advisors, insurance agents or other advisors utilized by our clients to ensure our client’s needs are met.

The specific manner in which fees are charged by Locke Advisory Services is established in the client’s written agreement with the Firm. Locke Advisory Services will generally bill its investment advisory fees on a quarterly basis in advance, based on the market value of assets on the last business day of the previous quarter. Accounts initiated or terminated during a calendar quarter may be charged a prorated fee. Clients may terminate their agreement at any time by

notifying the Firm in writing. Upon termination of an account, any paid and unearned fees will be promptly refunded.

The Firm deducts investment advisory fees from client accounts each calendar quarter after an invoice or statement of the amount of the fee has been provided concurrently to the client and the custodian of the client's account. Written authorization to deduct fees from a client's account is included as part of the client's written agreement with the Firm, as well as a limited power of attorney with the client's broker-dealer custodian. Clients may opt to pay the Firm from a separate account instead of having fees deducted from client accounts.

In addition to paying the Firm's investment advisory fees, clients will bear a proportionate amount of the aggregate fees and expenses of mutual funds, ETFs and other securities in which they are invested. Mutual funds and ETFs may also charge fees when clients purchase or redeem their funds, known as a "load" or transaction fee, as well as internal management fees. Details about these fees are disclosed in the fund's prospectus. Additionally, the Firm's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses imposed by broker-dealer custodians which may be incurred by the client. These other related costs and fees may include, but not be limited to fees charged by managers, custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm does not receive any portion of these third-party commissions, fees and costs.

When recommending mutual funds for client accounts, the Firm generally recommends no-load mutual funds to keep client fees and costs associated with investing as low as possible. The Firm may recommend mutual funds that charge a transaction fee upon the purchase or redemption of the mutual fund when the Firm believes the fund's historic performance and future prospects justify paying such a fee. Although the Firm generally recommends no-load mutual funds, we do not exclude funds from our recommendations solely because a fund charges a transaction fee. The Firm receives no portion of any fee charged by a mutual fund and receives no commission or other compensation associated with the purchase or sale of such funds recommended to clients.

Clients may choose a broker-dealer custodian to maintain their account and to purchase and sell investment products as recommended by our Firm. Although our Firm is not affiliated with any broker-dealer custodian, we recommend a preferred broker-dealer custodian which is used by the majority of our clients. Item 12 describes the factors that Locke Advisory Services considers in selecting or recommending broker-dealer custodians for client transactions and determining the reasonableness of their compensation.

Personal Financial Planning Fees

Personal financial planning services are generally billed at an hourly rate of \$240. Clients are billed in arrears after receiving personal financial planning services. Clients may terminate their agreement at any time by notifying the Firm in writing. Upon termination of any account, any

earned, unpaid fees will be due and payable. Our hourly rate may be negotiable depending on the nature, extent and complexity of services and is subject to change in the future.

Tax Services Fees

Individual and small business tax services fees are generally billed at hourly rates of \$240. Clients will generally be billed monthly in arrears for engagements lasting for more than a month and after completion of tax services for engagements lasting less than a month. Clients may terminate their agreement at any time by notifying the Firm in writing. Upon termination of any account, any earned, unpaid fees will be due and payable. Our hourly rate may be negotiable depending on the nature, extent and complexity of services and is subject to change in the future.

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

Locke Advisory Services does not charge performance-based fees. Performance-based fees are generally based on a share of capital gains on, or capital appreciation of, the assets of a client. The Firm is not engaged in side-by-side management of client accounts. Side-by-side management is when conflicts of interest may arise when an investment advisor manages one or more client portfolios under a performance-based fee arrangement and also manages portfolios under another type of fee arrangement, such as a flat fee, hourly rate or an asset-based fee.

Item 7 – Types of Clients

Locke Advisory Services provides investment advisory, personal financial planning and tax services primarily to individuals, trusts and small businesses. While there is no minimum size account requirement, the Firm typically charges a minimum quarterly fee of \$750 per investment advisory client who has attained the age of 30 and \$400 for clients younger than age 30.

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

Methods of Analysis and Investment Strategy

As part of the implementation of investment plans, Locke Advisory Services believes that constructing a well-diversified portfolio may allow for achievement of client investment goals while mitigating risk of loss. To achieve a high degree of diversification, the Firm primarily implements portfolios consisting of highly liquid, publicly-traded equity securities (“stocks”), equity mutual funds and ETFs, and bond mutual funds and ETFs consistent with the client’s investment goals, time horizon and risk tolerance. Our methods of analysis for stocks include employing a combination of fundamental and technical analysis. Fundamental analysis includes analyzing the underlying company’s revenue and earnings growth estimates, valuation metrics, dividend yield and a review of certain ratios. Technical analysis includes analyzing historic stock price trends by reviewing moving averages, support and resistance levels, and certain other

technical indicators. Our methods of analysis for mutual funds and ETFs include reviewing each fund's investment objective, category, Morningstar Style Box, performance history and tenure of management. We may also consider other factors such as the interest rate environment, employment trends, economic growth or other factors, as deemed necessary. For bond mutual funds and bond ETFs, we consider average duration as well as the bond fund category, periodic performance and management tenure, as well as the interest rate environment and other economic factors. Regardless of how well diversified a portfolio may be or how well securities have performed in the past, investing in securities involves the risk of loss that clients should be prepared to bear. Past performance of any security may not be indicative of future performance.

We generally group clients into one of five risk profiles to best match their investment objectives and risk tolerance: aggressive, moderately aggressive, moderate, moderately conservative and conservative. Our portfolio selection for an aggressive client, for example, may have an asset allocation weighted more heavily towards growth stocks and growth mutual fund and ETF categories. On the other hand, a portfolio selection for a conservative client may have an asset allocation weighted more heavily towards value stocks and bonds, and mutual fund and ETF categories such as value, bonds and cash equivalents. Clients may hold or retain other types of assets as well, for example, real estate. Locke Advisory Services may offer advice regarding other client assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client with their overall wealth management and financial planning.

Regardless of the client's risk tolerance, allocating assets to achieve a well-diversified portfolio is important in seeking to manage the overall risk of loss. Asset allocation involves achieving diversification by dividing investments among asset classes and fund categories, and investing in multiple securities within each asset class or fund category. For equity securities, diversification may be achieved through allocating equity holdings across multiple industry sectors, market capitalization categories and geographic location. Bond diversification may be achieved through allocating bond holdings across multiple types of bonds and duration. Diversification may be enhanced further with mutual funds or ETFs that hold numerous securities within each fund. Each mutual fund or ETF typically has a high number of securities holdings within the fund, enhancing a client's portfolio diversification. Further diversification may be achieved with multiple mutual fund or ETF selections within each asset class or fund category in a client's portfolio. The Firm primarily recommends broadly traded, highly liquid stocks, mutual funds, ETFs and other securities belonging to the following three major asset classes: (i) equity securities for growth, capital appreciation and dividend income, (ii) fixed income securities, including corporate and government bonds and other debt securities for generating interest income, and (iii) cash and cash equivalents for capital preservation and liquidity.

Client portfolios are reviewed no less frequently than quarterly. This portfolio review includes a review of the performance of securities within the client's portfolio, as well as the status of the client's asset allocation strategy. Individual securities within a client's portfolio may appreciate or decline in value at different rates, causing the actual asset allocation to differ from the intended asset allocation. This asset allocation difference causes a need to "rebalance" the portfolio by

buying or selling certain securities to adjust the actual asset allocation back to the client's intended asset allocation.

Locke Advisory Services believes that an investment strategy based on a well-diversified asset allocation selection and long-term view consistent with the client's investment objectives is the best way to achieve client investment goals. The Firm believes it is generally difficult, if not impossible, to effectively time the market in the short-term by attempting to predict market or security price lows and highs as a means of buying and selling investments for profit. The Firm believes that frequent trading of securities elevates risk and may increase brokerage fees and other transaction costs that the Firm generally seeks to minimize. Further, the Firm does not utilize securities that we consider to have unusual risks.

Analysis of Client Financial Status

In developing investment plans and recommending asset allocation for clients, Locke Advisory Services relies on information provided by our clients to prepare an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. The Firm may use back-tested historical data to develop various models appropriate for a variety of risk levels. Based on data collected and analysis performed, the client and adviser agree on an appropriate risk tolerance, time horizon and asset allocation strategy. Past performance of any security or assumption may not be indicative of future performance. Creating projections of any kind involves estimating future assumptions, which is inherently uncertain and includes various risks.

Such risks include but are not limited to:

- Expected future cash inflows will not meet the assumptions used in the analysis.
- Expected future cash outflows will exceed the assumptions used in the analysis.
- Future rates of return will fall short of the estimates used in the analysis.
- Inflation will exceed the estimates used in the analysis.
- Tax rates will be higher than rates assumed in the analysis.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. The two fundamental risks associated with investing in securities are the risk of loss of principal and the risk that total return will be less than inflation. One or both of these risks are present when investing in the vast majority of securities. Loss of principal is the risk that the value of securities is less when sold or otherwise disposed of, than when purchased. When the total return of securities is less than inflation, the proceeds from income while holding the securities and upon sale or other disposal of the securities may result in reduced purchasing power.

Mutual funds and ETFs utilized by the Firm may include funds invested in domestic and international equities, real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities (stocks, mutual funds and ETFs) may include large capitalization, medium capitalization and small capitalization stocks. Among the riskiest securities used in the Firm's investment strategies are primarily growth category

securities included in client portfolios who have a higher risk tolerance with a growth objective. These stocks, mutual funds and ETFs may consist of U.S. and International small- to mid-size capitalization growth funds. Among other things, the risk of principal loss may be caused by broad market declines, declines in individual securities, declines in asset classes, changes in economic conditions, legislative risk, political risk, business risk and changes in interest rates. Certain funds utilized by the Firm may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, geopolitical risks and potentially, additional price volatility. These risks may be greater with investments in developing countries. Equity securities tend to have a higher risk of possible loss of principal as compared to fixed income securities.

Mutual funds and ETFs invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings. Conservative fixed income securities have a lower risk of loss of principal, but many bonds present the risk of loss of purchasing power through lower expected returns. The value of fixed income securities may also fluctuate in an inverse relationship with the fluctuation in interest rates and inflation.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses.

Item 9 – Disciplinary Information

Locke Advisory Services has not been involved in any legal or disciplinary event and therefore, has no disclosure for this section.

Item 10 – Other Financial Industry Activities and Affiliations

Locke Advisory Services has no affiliation with any other financial services firm.

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

Locke Advisory Services has adopted a Code of Ethics for 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 and self-dealing, restrictions on the acceptance of significant gifts and business entertainment items, and personal securities trading procedures, among other things.

Because the Firm is not a broker-dealer and its investment advisor representative is not an agent for any broker-dealer, the Firm does not affect any principal or agency cross securities transactions for client accounts. Principal transactions are generally defined as transactions where a firm, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to an advisory client. An agency cross transaction is defined as a

transaction where an 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. Locke Advisory Services is not registered as a broker-dealer and is not affiliated with any broker-dealer.

Various stocks, bonds, mutual funds and other securities the Firm recommends for purchase or sale to clients may be suitable for multiple clients as well as employees of the Firm. Locke Advisory Services anticipates that in the ordinary course of business, it will buy or sell securities in client accounts where the Firm has discretionary authority, and recommend to clients or prospective clients, the purchase or sale of securities in which employees of Locke Advisory Services and/or clients, directly or indirectly, have a position of interest. Subject to satisfying the Firm's Code of Ethics and applicable laws, officers, directors and employees of Locke Advisory Services may trade for their own accounts in securities which are recommended to clients to buy, sell or otherwise dispose of. The Firm's Code of Ethics prohibits employees from engaging in any manipulative practice with respect to securities, including price manipulation, and prohibits engaging in front running and/or profiting personally, directly or indirectly, as a result of insider knowledge about a security or a transaction. Since Mr. Locke is the sole investment advisor representative of the Firm, its Code of Ethics does not require pre-clearance of employee transactions. Nevertheless, its Code of Ethics is designed to assure that the personal securities transactions, activities and interests of its employees will not interfere with their decision making in the best interest of advisory clients and implementing such decisions.

When we provide investment advice to clients regarding their 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 client interests, so we operate under a special rule that requires us to act in our clients' best interest and not put our interests ahead of theirs.

Locke Advisory Services clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Art Locke at 571-271-5125 or alocke@lockeadvisory.com.

Item 12 - Brokerage Practices

Although clients may choose a broker-dealer custodian to buy and sell securities and maintain their investment accounts, Locke Advisory Services recommends a preferred broker-dealer custodian where the majority of the Firm's clients have their accounts. In recommending our preferred broker-dealer custodian to clients, we consider various factors including pricing, execution capabilities, financial strength, reputation and customer service. Locke Advisory Services is not affiliated with its preferred broker-dealer custodian and receives no commissions, referral fees, research, products, services or other compensation in exchange for directing clients to the Firm's preferred broker-dealer custodian. The primary reasons for using a preferred broker-dealer custodian are the broker-dealer custodian's high standing in the marketplace, operational efficiencies and bulk purchasing power to seek to negotiate the lowest possible transaction and other fees on behalf of the Firm's clients. Such negotiation is focused on the dollar amount of client fees and benefits, and does not include other benefits to the Firm or Mr. Locke.

Broker-dealer custodian transaction fees may differ from client-to-client depending on the nature, extent and size of the client's relationship with the broker-dealer custodian. We do not require clients to execute transactions through a specific broker-dealer.

"Soft dollar benefits" arise when a firm receives research, or other products and services other than execution, from a broker-dealer or a third party in connection with client securities transactions. The majority of the Firm's clients use the Firm's preferred broker-dealer custodian, which is one of the largest, well-known and reputable broker-dealer custodians in the country. Mr. Locke also uses the broker-dealer custodian for his personal and family investments. The Firm's preferred broker-dealer custodian makes available to its clients, including the Firm and Mr. Locke, certain current and historical information about stocks, bonds, mutual funds and ETFs. It also provides clients with third-party research reports on various topics including market, sector and investment analysis. The Firm believes these soft dollar benefits are eligible "research or brokerage services" under section 28(c) of the Securities Act of 1934. The Firm has no arrangement under which investment research or other benefits are received in exchange for broker-dealer fees charged in connection with client securities transactions.

The Firm's preferred broker-dealer custodian generally discontinued the practice of charging a commission for executing U.S. domestic exchange-traded stock and no-transaction fee mutual fund and ETF trades online and by automated phone service. There are generally no fees charged by the Firm's preferred broker-dealer custodian related to the purchase or sale of domestic exchange-traded securities on the broker-dealer custodian's online advisor platform used by the Firm.

In certain cases, for example, for broker-assisted trades, foreign transactions, over-the-counter transactions and certain transaction-fee mutual funds and ETFs, each client may be charged a transaction fee by the Firm's preferred broker-dealer custodian to execute each stock, bond, mutual fund and ETF transaction regardless of the amount of the transaction or the frequency of transactions. The Firm believes such fees, if any, are reasonable in relation to the value and quality of the brokerage and research services provided by the Firm's preferred broker-dealer custodian. Neither the Firm nor Mr. Locke receive bookkeeping, administrative or other services from the Firm's preferred broker-dealer custodian.

By directing the execution of transactions through broker-dealers recommended by our Firm or chosen by our clients, the Firm may be unable to achieve most favorable execution of client transactions, and that practice may cost clients more money. As noted above, there are generally no fees charged by the Firm's preferred broker-dealer custodian related to the purchase or sale of domestic exchange-traded securities on the broker-dealer custodian's online advisor platform used by the Firm. When the Firm's securities activities involve mutual funds, best execution is not an issue since mutual fund trades are executed at the fund's Net Asset Value.

The Firm may aggregate the purchase or sale of securities for various client accounts ("block trade"). If the total number of shares in the block trade are not purchased, each client is allocated their proportionate share based upon a ratio that their original share quantity in the block trade bears to the total quantity of shares in the block trade.

Item 13 - Review of Accounts

All accounts are managed pursuant to an investment policy statement agreed upon with each client. After the investment policy statement is in place and an asset allocation strategy is established, the client's investment portfolio is reviewed by a Firm investment advisor representative at least quarterly, and more frequently, as deemed necessary. The goal of Locke Advisory Services is to implement changes in holdings or allocations in a reasonably timely manner to maintain consistency with the client's investment policy statement and asset allocation strategy. Depending upon the extent of change required to implement each new client's asset allocation strategy and other factors including economic conditions, market factors and tax implications, it may take several quarters and, in some cases, more than a year to transition a new client's account to the intended asset allocation strategy.

Clients are generally able to logon to their broker-dealer custodian accounts at any time to check their account balance, investments, realized and unrealized gains, dividends, transaction activity, broker-dealer custodian fees and expenses, periodic statements, year-end tax reporting, mutual fund and ETF prospectus, performance analysis, advisor fees deducted from client accounts and other information. Clients receive at least quarterly and annual statements from their chosen broker-dealer custodian showing their investment holdings, market value, dividends, gains and losses, fees, transaction detail and year-end tax information. Locke Advisory Services provides quarterly written reports to each client summarizing the market value of investments held, percentage of total portfolio for each holding, investment performance for the quarter, historical performance for each mutual fund, comparison of portfolio asset allocation to target asset allocation and a fee summary. We may also provide additional ad-hoc reports from time-to-time as requested by clients.

Although the Firm desires to conduct a review of accounts with each client no less frequently than quarterly, the timing and manner in which periodic reviews are conducted is determined primarily based on each client's individual needs, preferences and schedules. During these periodic client meetings, the Firm reviews personal financial information with each client to determine if any significant events have occurred that would indicate a change is needed to the client's investment policy statement and asset allocation.

Item 14 - Client Referrals and Other Compensation

Locke Advisory Services receives no compensation for referring customers to other product sponsors and service providers.

Item 15 - Custody

Custody of client cash and securities is maintained by each client's broker-dealer custodian. Locke Advisory Services does not maintain custody of client cash or securities, except as described further in Item 5. above, whereby investment advisory fees may be deducted from the client's account.

Clients should receive at least quarterly statements from their chosen broker-dealer custodian which holds and maintains each client's securities, as custodian for their accounts. Locke Advisory Services urges each client to carefully review periodic statements from their broker-dealer custodian. Clients should also carefully review any reports and analysis from Locke Advisory Services and compare them to statements from their broker-dealer custodian. Certain analysis from the Firm may vary from broker-dealer custodian statements based on reporting dates or valuation methodologies of certain securities.

Item 16 - Investment Discretion

Locke Advisory Services typically receives discretionary authority from its clients. Discretionary authority ("discretion") over client investments gives the Firm the ability to select the securities, dollar amount, price and timing to be bought or sold without prior approval from the client. Investment discretion is granted to the Firm through our investment advisory agreement with our clients and based on a duly executed limited power of attorney with the client's broker-dealer custodian. Such discretion is exercised in a manner consistent with each client's investment policy statement. When selecting securities and determining amounts, Locke Advisory Services observes the investment policies, limitations and reasonable restrictions of the clients for which it advises.

Item 17 - Voting Client Securities

As a matter of Firm policy and practice, Locke Advisory Services has no authority to and does not vote proxies on behalf of investment advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients receive their proxies directly from their custodian or a transfer agent. Locke Advisory Services may provide advice to clients regarding the client's voting of proxies.

Item 18 - Financial Information

The Firm does not solicit fees of more than \$500 per client, 6 months or more in advance.

Locke Advisory Services 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 Advisors

Certain information required in this section is included elsewhere in this Form ADV.

As discussed in Item 5 above, the Firm is compensated based on a percentage of assets under management and may charge a minimum quarterly fee. The Firm is not compensated for advisory services with performance-based fees.

Part 2B of Form ADV
Brochure Supplement

ARTHUR S. LOCKE, III, CPA/PFS, CFP®

President & CEO

LOCKE ADVISORY SERVICES LLC

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March 30, 2025

This brochure supplement provides information about Arthur S. Locke, III, CPA/PFS, CFP® that supplements the Locke Advisory Services LLC brochure. You should have received a copy of the brochure. Please contact Mr. Locke at 571-271-5125 or alocke@lockeadvisory.com if you did not receive the Locke Advisory Services LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Arthur S. Locke, III, CPA/PFS, CFP® is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Arthur S. Locke, III, CPA/PFS, CFP® was born in 1963 and is 61 years old as of the date of this Brochure. Mr. Locke received a Bachelor of Science in Business Administration from American University in May 1986, with a double major in accounting and computer systems. Mr. Locke received his Certified Public Accountant (“CPA”) certification in May 1988 and is a licensed CPA in the State of Virginia. In July 2018, Mr. Locke passed the CFP® Certification Examination administered by the CFP Board and became a CFP® in December 2019. In June 2017, Mr. Locke passed the Personal Financial Specialist (“PFS”) Exam and became a credentialed CPA/PFS. The PFS credential is administered by the Association of International Certified Public Accountants (“AICPA”) and is only available to CPAs. Mr. Locke passed the Series 65 Uniform Investment Advisor Law Examination in December 2016.

From September 2011 through December 2016, Mr. Locke was a private investor performing fundamental and technical equity research for his family accounts, investing in a wide range of mutual funds and publicly traded equities.

From 1994 to 2011, Mr. Locke worked in an executive capacity for five publicly-traded companies, including Chief Financial Officer (“CFO”) for three. Mr. Locke served as Senior Vice President and CFO of Websense Inc. from July 2009 to September 2011. Mr. Locke served in several executive positions of MicroStrategy Incorporated from January 2001 to March 2009, including Executive Vice President and CFO from January 2005 to March 2009. In 2006, during his tenure at MicroStrategy, Mr. Locke was a top-five finalist for the 2006 Greater Washington Technology Council Public Company CFO of the Year. Mr. Locke started his career with the CPA firm Touche Ross & Co (now Deloitte), and later joined the CPA firm Coopers & Lybrand (now PwC).

The State of Virginia requires Uniform CPA Examination (“CPA Exam”) candidates to have at least 120 semester hours of education, a baccalaureate degree or higher, and an accounting concentration or equivalent. The CPA Exam is a 14-hour test consisting of four parts: Auditing and Attestation, Business Environment and Concepts, Financial Accounting and Reporting, and Regulation. Virginia currently requires 150 semester hours of education for licensure and has a minimum experience requirement of 1 year providing accounting, financial, tax or other relevant services. The State also requires 120 hours of continuing professional education (“CPE”) over a 3-year period with a minimum of 20 hours annually. Licensees must complete 2 hours of CPE credits in ethics each calendar year.

The CFP® exam and the PFS exam are 7-hour tests consisting of a broad range of topics including personal financial planning, investment planning, retirement planning, employee and business owner planning, risk management, estate planning, charitable planning, elder and special needs planning, education planning, professional responsibilities and the legislative and regulatory environment. CFP® professionals are required to complete 30 hours of continuing education (“CE”) over each 2-year reporting period as follows: 2 hours of CFP Board approved Ethics CE and 28 hours of CE covering 1 or more of CFP Board’s Principal Topics.

The Series 65 Uniform Investment Advisor Law Examination is a 3-hour exam prepared by the North American Securities Administrators Association and administered by FINRA. The Series 65 exam covers questions in 4 critical function areas: Economic Factors and Business Information, Investment Vehicle Characteristics, Client Investment Recommendations and Strategies, and Laws, Regulations, and Guidelines, including Prohibitions on Unethical Business Practices.

Item 3 - Disciplinary Information

Mr. Locke has not been involved in any legal or disciplinary event and therefore, has no disclosure for this section.

Item 4 - Other Business Activities

Mr. Locke is not involved in any other investment-related business or occupation.

As described in further detail in Locke Advisory Services LLC's Form ADV Part 2 Brochure, Mr. Locke provides tax planning and preparation services to individuals and small businesses as part of the business of Locke Advisory Services LLC. These services are provided for an additional fee and compliment the Firm's investment advisory and personal financial planning services for individuals and small business owners. Mr. Locke spent less than 10% of his time providing tax planning and preparation services.

Mr. Locke is not involved in any other business activity or activities that provide a substantial source of income or involve a substantial amount of his time.

Item 5 - Additional Compensation

Mr. Locke does not receive any economic benefit for providing advisory services from anyone who is not a client. Mr. Locke does not receive sales awards, other prizes, bonuses, or other compensation for the number or amount of sales, client referrals or new accounts.

Item 6 - Supervision

Mr. Locke is the founder, sole owner and sole investment advisor representative of Locke Advisory Services LLC. As such, information required by this section is not applicable.

Item 7 - Requirements for State-Registered Advisors

Mr. Locke has never been found liable in an arbitration claim or a civil, self-regulatory organization or administrative proceeding. Mr. Locke has never been the subject of a bankruptcy petition.