



CROSS BORDER WEALTH, LLC
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This brochure provides information about the qualifications and business practices of Cross Border Wealth, LLC. If you have any questions about the contents of this brochure, contact us at 646-688-5333 and/or compliance@crossborder-wealth.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about Cross Border Wealth, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Cross Border Wealth, LLC's registration as an investment adviser does not imply a certain level of skill or training.

Version date: March 19, 2025

Item 2 Material Changes

Summary of Material Changes

The material changes in this brochure from the last annual updating amendment of Cross Border Wealth, LLC on 03/06/2024 are described below. Material changes relate to Cross Border Wealth, LLC's policies, practices or conflicts of interests.

- CBW may retain third parties to act as solicitors/promoters for CBW's investment management services. (Item 14)

Delivery Requirements

We will provide a summary of any material changes to this Brochure to our clients at least annually, within 120 days of our fiscal year end. Furthermore, we will provide our clients with other interim disclosures about material changes as necessary.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us at 646-688-5333 or compliance@crossborder-wealth.com.

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Item 4 Advisory Business

FIRM DESCRIPTION

Cross Border Wealth, LLC (hereinafter referred to as “CBW”, “we”, “us”, or “our firm”) is a Delaware limited liability company with its principal office located in New York, NY and has been in business as a registered investment adviser since 2017. The principal owners of the firm are Andoni Yturralde and Fabrice Mercier.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

As of December 2024, CBW manages \$138,847,646 of client assets on a non-discretionary basis. We do not manage any client assets on a discretionary basis.

ADVISORY PROGRAMS

This Brochure describes the advisory services we offer to our clients. CBW enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Investment Advisory Agreement”). The Investment Advisory Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services.

Our advisory services are offered through certain individuals who have registered with CBW as its investment adviser representatives (“advisors”). Clients should refer to such advisor’s Form ADV Part 2B (the “Brochure Supplement”) for more information about their qualifications.

During our initial meeting or conversations, our advisory services will be explained to the client and tailored to their needs based on their individual investment objectives, risk tolerance, and cash or income needs. At this time and, at any time afterward, clients may impose restrictions on investing in certain types of securities. Although CBW seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firms’ investment philosophy or that may have an adverse effect on our ability to manage your account. Clients should promptly notify CBW if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

Our advisors may offer all or any combination of the advisory services described below to our clients:

Investment Advisory Services. We provide non-discretionary portfolio management services where we provide advice and recommendations to the client to assist them in making investment decisions to meet their investment goals and objectives. We will first consult with the client before placing any specific order or obtain specific authorization from the client for each specific transaction. We will monitor the client's account on an ongoing basis and conduct periodic portfolio reviews with the client to discuss their investment needs, goals, and objectives.

Client accounts will primarily be invested in exchange traded funds (ETFs). Other types of securities including, but not limited to are: mutual funds, individuals equities, individual bonds, options and structured products. Our advice is generally limited to these types of investments, but we reserve the right to advise or not advise our clients on certain investments should we deem it appropriate based on their particular circumstances. We may hold all or a portion of Client's account in cash. Please see the section titled "Methods of Analysis, Investment Strategies, and Risk of Loss" for further details.

For clients subscribed to our portfolio management services, we also provide financial planning services where we will work with clients to review their current financial position, stated goals and objectives and make recommendations on how clients can manage their financial resources based on an analysis of their individual needs. Recommendations may be in the form of a written financial plan or a verbal consultation. The client is under no obligation to act upon our recommendations.

Pension Consulting Services. We provide complete pension advisory services where we will assist clients with their plan conversions and guide them through all available options and investment opportunities. The services take into account information collected from the client such as financial status, investment objectives, among other data. We will review the plan features, investments, services and fees in the client's current pension plan and if deemed to be in the client's best interest, we may recommend that the client move their assets to an individual retirement account or another pension plan provider. As part of these Pension Consulting services, we do not manage or exercise investment discretion or trading authority over these client portfolios. If a client would like to have our firm manage their portfolio, they may choose to engage us for our Portfolio Management service.

Wrap Fee Programs. CBW does not participate in any wrap fee programs.

Important Note: It is the client's responsibility to ensure that CBW is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

Item 5 Fees and Compensation

ADVISORY FEES

The following information describes how CBW is compensated for the advisory services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ between clients depending upon the individual Investment Advisory Agreement with each client. CBW reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. CBW has the general discretion to waive all or a portion of our fees, but typically only exercises this discretion for our employees.

Fees for Portfolio Management Services. In consideration for providing portfolio management services and pursuant to the Investment Advisory Agreement with the client, CBW charges an annual asset-based fee based on the client's assets under management ("AUM") as valued by the custodian. Fees are negotiated with each client based on a variety of factors, such as the amount of assets being managed, future deposits to the accounts under our management, the level and type of services provided and/or the nature of the relationship with the client. Our standard fee rates are provided below.

Schedule of Fees.

Assets Under Management	Annual Fee
Assets less than \$500,000	1.25%
\$500,001 to \$1,500,000	1.00%
\$1,500,001 to \$3,000,000	0.75%
\$3,000,001 to \$5,000,000	0.50%
\$5,000,001 and above	0.25%

CBW generally bills our fees on a monthly or quarterly basis in arrears, in cases where Charles Schwab is the custodian, the firm will bill clients quarterly in advance. Clients must authorize the deduction of our fees from their managed accounts by the qualified custodian and choose the method by which our fees will be calculated. Clients may elect to have our advisory fees calculated by our firm and deducted from their accounts. The client makes this election when applying for their account at custodian of choice or at any time or cancel the existing arrangement.

CBW charges a minimum monthly investment advisory fee of 100 USD for Interactive Brokers accounts and minimum quarterly investment advisory fee of 300 USD for Charles Schwab accounts.

Fees for Pension Consulting Services. CBW charges a fixed consulting fee of up to 2% with a minimum of 2K GBP and maximum of 15K GBP based on the client's assets in their pension plan. Clients' fees will be deducted from their pension assets by the trustee or custodian and paid to CBW upon completion of the consultation.

Additional Fees and Expenses. Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer, qualified custodian trustee, administrator and/or plan sponsor through which account transactions are executed. For more information on our brokerage practices, please refer to the “Brokerage Practices” section of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund’s prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm and others.

Termination. The Investment Advisory Agreement may be terminated by either party at any time upon thirty (30) days written notice to the other party. Upon termination of our status as the client’s investment adviser, CBW will not take any further action with respect to the client’s account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

Refunds. Upon receipt of a proper notice of termination from the client, as described in the Investment Advisory Agreement, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

Brokerage Commissions. CBW does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

Any material conflicts of interest between clients and CBW or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, CBW will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

Item 6 Performance-Based Fees

PERFORMANCE BASED FEES

CBW does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their accounts.

Item 7 Types of Clients

TYPES OF CLIENTS

CBW offers investment advisory services to a diversified group of clients including individuals, high net worth individuals, trusts, estates, and corporations and other business entities. Our advisory services are tailored to the needs of Expatriates Globally, Americans Overseas, and Foreign Nationals. Client relationships may vary in scope and length of service.

ACCOUNT REQUIREMENTS

CBW generally requires a minimum account balance of \$250,000 for our portfolio management services. However, CBW in its sole discretion may waive or lower our minimum account balance requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

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

METHODS OF ANALYSIS

The securities analysis methods employed by CBW may include fundamental analysis and technical analysis.

Fundamental Analysis. This method of analysis attempts to identify the intrinsic value of a security by looking at economic, financial and other quantitative or qualitative factors to determine if the security is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements.

Technical Analysis. This method of analysis involves the evaluation of historical market data for a particular investment to identify recurring trading patterns that predict future price movements.

Our methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

Strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing. The investment strategy for a specific client is based upon the objectives stated by the client during our initial consultations. The client may change these

objectives at any time. Risk management is integrated into our process through the use of appropriate risk levels on each position. The value of securities used in our strategies may go up or down in response to factors not within our control, including but not limited to the status of an individual company underlying a security, or the general economic climate. When investing client portfolios, we seek to maintain discipline and objectivity by focusing on the client's financial goals and objectives and avoiding trading on short term uncertainties such as position specific news events.

RISK OF LOSS

Any investment carries a certain degree of risk, including a possible loss of principal that clients should be prepared to bear. The value of securities used in all of our strategies may go up or down in response to factors not within our control, such as but not limited to the status of an individual company underlying a security, or the general economic climate. There is no guarantee that any of the investment strategies that our firm employs will outperform the investment strategies used by other firms. Past performance is no guarantee of future results and avoiding trading on short term uncertainties such as position specific news events.

Investors should be aware their investment is not guaranteed and understand that there is a risk of loss of value in their investment.

Item 9 Disciplinary Information

REQUIRED DISCLOSURES

We are required to disclose all material facts in regard to any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Below is a summary of the material disciplinary events against our senior management personnel:

- 1 Name: Andoni Yturralde

Date of Action: January 27, 2017

Type of Event: Termination

Mr. Yturralde was terminated from deVere USA Inc. for exercising discretion in a nondiscretionary client account, failure to adhere to the client's trading instructions in 2016, and his related non-compliance with the firm's policies and procedures.

- 2 Name: Andoni Yturralde

Date of Action: February 4, 2009

Type of Event: Termination

Mr. Yturralde's employment at Merrill Lynch Pierce Fenner & Smith was terminated after he represented to the firm that certain transactions in his personal account were fraudulent and received a credit from the firm for those charges. Mr. Yturralde later acknowledged that he had made the charges. This matter was not related to Mr. Yturralde's handling of client accounts.

Additional details about these disciplinary events can be obtained by visiting the SEC's Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov.

Item 10 Other Financial Industry Activities and Affiliations

OUTSIDE BUSINESS ACTIVITIES

Neither CBW nor any of its employees are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

AFFILIATED ENTITIES

CBW does not have relationships or arrangements with any affiliated entities that create a material conflict of interest for our clients.

CONFLICT OF INTEREST

CBW does not have any business relationships with other investment advisers that create a material conflict of interest for our clients.

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

CODE OF ETHICS

CBW has adopted a Code of Ethics (the "Code") that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, 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.

All employees of CBW are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand and will comply with the Code.

Clients and prospective clients may request a full copy of our firm's Code of Ethics by contacting our firm in writing at Cross Border Wealth, LLC, 230 Park Avenue, 4th Floor West New York, NY 10169 or calling our firm at 646-688-5333.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

CBW and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. CBW has adopted procedures designed to assure that the personal securities transactions, activities and interests of CBW and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

PERSONAL TRADING

CBW and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. CBW has adopted procedures designed to assure that the personal securities transactions, activities and interests of CBW and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

Item 12 Brokerage Practices

SELECTION OF BROKER-DEALERS

Securities transactions are generally executed through Interactive Brokers, LLC. ("Interactive Brokers"), member FINRA/SIPC/NYSE, Charles Schwab, Novia Global, RL 360 and Utmot. All custodians maintain custody of our clients' assets and effects securities transactions for our portfolio management clients' accounts. CBW is independently owned and operated and is not affiliated with or a related person of any other entity.

CBW considers a number of factors prior to recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by the financial institutions we recommend, are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

Research and Other Soft Dollar Benefits. CBW works with several financial institutions that offer products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of our fees from clients' accounts, and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts.

CBW may also receive services from its affiliates that are intended to help our firm manage and further develop our business. These services may include registration support website design and technology support. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research.

CBW does not participate in any commission-sharing arrangements or receive soft dollar credits. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Our firm routinely compares order execution disclosure information to other broker-dealers to ensure best execution for our clients' securities transactions. Although the brokerage commissions and/or transaction fees charged may be higher or lower than those charged by other broker-dealers, in seeking best execution for our clients our firm strives to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided.

Brokerage for Client Referrals. CBW does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

Directed Brokerage. While CBW generally recommends that clients direct transactions through certain broker-dealers, we do not have discretionary authority to determine the broker-dealer to be used for the purchase or sale of securities for client accounts or the commission rates paid to a broker-dealer for client securities transactions.

In rare cases, CBW may utilize other broker-dealers when requested by the client. Clients of CBW must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to affect their transactions through a particular broker-dealer, we require such directions to be in writing.

TRADE AGGREGATION

Trade orders for the same security entered on behalf of more than one client will generally be aggregated pursuant to our firm's trade aggregation procedures.

Investment decisions deemed appropriate for one client may also be deemed appropriate for other clients so that the same security may be purchased or sold at or about the same time for more than one client. When this is the case our firm may, but is not obligated to, aggregate similar trades for multiple clients and execute the trade as a single block.

When transactions are so aggregated, the securities purchased or sold will be allocated in a fair and equitable manner. Our trade allocation procedures seek to allocate investment opportunities among our clients in the fairest possible way taking into account their best interests. These procedures ensure that allocations do not involve a practice of favoring or discriminating against any client or group of clients. Transactions are usually aggregated to seek a more advantageous net price and/or to obtain better execution for all clients. Nevertheless, there is no assurance that the aggregation of transactions will benefit all clients equally, and in some instances combined orders could adversely affect the price or volume of a security. Also, it is possible that we may not aggregate trades in circumstances where it would be beneficial to do so.

TRADE ERRORS

From time to time, our firm may make a trade error when servicing a client's account. When this occurs, we will correct the trade as soon as we discover the error. Trading errors will be corrected at no cost to clients. If there is a cost associated with this correction, such cost is borne by CBW and not the client. Note that we do not credit accounts for market losses unrelated to our error.

[Item 13 Review of Accounts](#)

ACCOUNT REVIEWS

CBW conducts account reviews at least annually for clients subscribed to our portfolio management services. The frequency of the review depends upon a variety of factors such as: the client's risk profile, activity in the account, economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted at intervals mutually agreed upon by the advisor and the client. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

ACCOUNT REPORTS

Clients have direct and continuous access to their account information and related documents via the password-protected website of the qualified custodian with which their accounts are held.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

CBW may retain third parties to act as solicitors/promoters for CBW's investment management services. Compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. CBW will ensure each solicitor/promoter is properly exempt or registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with the Advisers Act, where applicable.

OTHER COMPENSATION

CBW does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services.

Item 15 Custody

CUSTODY OF CLIENT FUNDS AND SECURITIES

CBW does not exercise custody over client assets or accounts. We work with qualified financial institutions who maintain custody of client funds in separate investment account(s) for each client under the client's name. CBW personnel may assist the client in preparing paperwork to open a new investment account, but only the client is permitted to authorize, by their signature, the opening of the account. The financial institution usually sends an account-opening letter via email after the account is approved. Clients enrolled to use the financial institution's automatic advisor fee billing function will be sent an invoice each time a fee is charged to their account(s). This invoice reflects the fee charged, the fee calculation methodology, and the period covered by the fee.

Clients can usually also access daily, monthly and annual account statements as well as daily trade confirmations through the custodian's website. Clients should also expect to receive quarterly account summaries from the qualified custodian. Clients should carefully review the account statements and summaries received from the qualified custodian(s) and compare such official custodial statements to any account reports provided by our firm. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Item 16 Investment Discretion

AUTHORITY

CBW does not accept discretionary authority to manage securities accounts on behalf of clients. However, we will exercise limited discretion with respect to the price at which, or the time when, an order for the purchase or sale of a specified security shall be executed.

Item 17 Voting Client Securities

AUTHORITY TO VOTE CLIENT PROXIES

CBW does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. The qualified custodian holding clients' assets will send all such proxy documents it receives to the client so that the client may take whatever action the client deems appropriate. CBW does not offer clients any consulting assistance regarding proxy issues.

Item 18 Financial Information

REQUIRED DISCLOSURES

As previously discussed in this brochure, CBW does not accept discretionary authority when managing client assets. CBW does not require clients to prepay more than \$1,200 in fees six months or more in advance.

CBW has no financial commitments that would impair our firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

Form ADV Part 3 – Client Relationship Summary

Date: 06/20/2023

Item 1: Introduction

CROSS BORDER WEALTH, LLC is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: portfolio management (we review your portfolio, investment strategy, and investments). As part of our standard services, we typically monitor client accounts on a quarterly basis. Our firm offers non-discretionary services, and the retail investor makes the ultimate decision regarding the purchase or sale of investments. We do *not* limit the types of investments that we recommend. Our minimum account size is \$250,000. Please also see our Form ADV Part 2A ("[Brochure](#)"), specifically Items 4 & 7.

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? Our fees vary depending on the services you receive. Additionally, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. Our fixed fee arrangements are based on the amount of work we expect to perform for you, so material changes in that amount of work will affect the advisory fee we quote you. Portfolio management fees are charged either monthly or quarterly in arrears and pension consulting fees are charged on completion of the transfer. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#).

Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. Additionally, you will pay transaction fees, if applicable, when we buy or sell an investment for your account. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount**

Form ADV Part 3 – Client Relationship Summary

Date: 06/20/2023

of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please also see our [Brochure](#) for additional details.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?: *When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means (see heading immediately below).*

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see Item 10 of our [Brochure](#) for additional details.

Item 4: Disciplinary History

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Do you or your financial professionals have legal or disciplinary history? Yes, we have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

For additional information on our advisory services, see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/288330> and any individual brochure supplement your representative provides. If you have any questions, need additional information, or want another copy of this Client Relationship Summary, then please contact us at 646-688-5333.

Form ADV Part 3 – Client Relationship Summary

Date: 06/20/2023

Exhibit A – Material Changes to Client Relationship Summary

As part of our standard services, we typically monitor client accounts on a quarterly basis. (Item 2)