



Item 1 : Introduction: We are registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services: What investment and services and advice can you provide me?

We offer investment advisory services to retail investors. We provide investment management and financial planning on a regular ongoing basis, and divorce planning on an hourly or project basis. This may include developing and implementing your investment strategy, assistance with the implementation of your financial plan, and assisting counsel with the division of assets in divorce among other things. We provide investment management services on a discretionary basis, which allows us to buy and sell investments on your behalf without asking for permission in advance. Our client contract would grant us discretionary authority. Many clients find a benefit in investment management and financial planning, those clients become "Comprehensive Financial Planning" client, while those who are only interested in investment management become "Investment Only" clients. As part of our investment management service, we monitor the investments in our client accounts on an ongoing basis, and we review our client accounts at least quarterly. On a very limited basis we provide non-discretionary investment management services but no longer offer those services to new clients (with non-discretionary services, the retail investor makes the ultimate decision regarding the purchase or sale of investments).

We do not have any requirements for retail investors to open or maintain an account (other than routine account opening paperwork) such as minimum account size or investment amount, but comprehensive planning and investment advisory services are generally most appropriate for those with investable assets of \$1 million or more. We also reserve the right to impose a minimum annual fee which will be disclosed to clients in advance.

For additional information, please see Form ADV, Part 2A (Items 4 and 7).

CONVERSATION STARTER: Ask your financial professional:

- *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?*

Item 3: Fees, Costs, Conflicts, and Standard of Conduct *What fees will I pay?*

Fees and costs affect the value of your account. Please ask your financial professional to give you customized information on your specific fees and costs.

Depending on your unique needs, you may pay a quarterly ongoing asset-based fee of up to 1.20% of the value of cash and investments in your portfolio or a minimum annual fee of up to \$10,000 or an hourly fee of up to \$500 an hour or a combination of the above. The minimum annual fee is *not* in addition to the asset-based fee, we typically charge this fee for clients who do not have substantial assets today but want financial planning and investment management. The amount paid to our firm and your financial professional does not vary based on the type of investments we select on your behalf. The ongoing asset-based and minimum annual fees are typically debited directly from your investment portfolio and reduce the value of your account. In some rare cases we may bill you directly.

The investments we use on your behalf have their own fees which are assessed directly by the investment itself. The custodian (Schwab) or the custodian of your retirement accounts may impose transaction-based costs which are generally minimal in nature. We encourage you to review the fund prospectus for specific fund expenses or the fee information for specific investment managers to which your assets are allocated.

The more assets you have in the advisory account (including cash) the greater your fee will be. The percentage you pay will decrease as you reach breakpoints of 1 million, 2 million, and 5 million. As such, we have an incentive to increase the assets in your account in order to increase our fees while lowering the percentage fee you pay. We charge our fee quarterly even if we do not buy or sell within your account.



You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information, please see our Form ADV, Part 2A (Item 5).

CONVERSATION STARTER: Ask your financial professional:

- *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?*

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. When we recommend a party to provide custody and brokerage services to your account, we may be eligible to receive products or services from that party, but we do not base our decision to recommend that party on any products or services we may become eligible to receive from that party. Another example is that we might have an incentive to recommend that you take actions that retain your assets under our management and do not take actions that would reduce the amount of your assets under our management, but any of our recommendations for you must comply with our fiduciary duty to you.

CONVERSATION STARTER: Ask your financial professional:

- *How might your conflicts of interest affect me, and how will you address them?*

For additional information, please see our Form ADV, Part 2A (Item 12, Item 14).

How do your financial professionals make money?

We are ***only*** compensated for financial and investment services solely and directly from our clients. We ***never*** accept commissions, perks, or other benefits from any insurance or investment companies allowing us to work solely in your best interests. We do compensate one of our advisers based on a percent of revenue we receive from our clients which incentivizes this adviser to retain and increase the amount of assets under our management. The conflicts that this creates are similar to conflicts that generally apply to an advisory firm (and that we note above) that with more assets under a firm's management there will be more assets against which the firm's advisory fee will be charged.

Item 4. Disciplinary History *Do you or your financial professionals have legal or disciplinary history?*

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTER: Ask your financial professional:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Item 5. Additional Information

For additional information about our services and request a copy of this relationship summary, contact David Rosenthal, Principal and Chief Compliance Officer at 480-609-4337 or in writing at 8550 E Shea Blvd, Ste 130, Scottsdale AZ 85260.

CONVERSATION STARTER: Ask your financial professional:

- *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?*