Item 1. Introduction

We are registered as an investment adviser with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences between them.

Free and simple tools are available to research firms and financial professionals at <u>https://www.investor.gov/CRS</u>, which also provides educational materials about broker-dealers, investment advisers, and investing. There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, including financial planning and consulting, wealth management, subadvisory, and automated investment program services. We generally manage your portfolio by allocating assets among various mutual funds and ETFs using one or more of our proprietary model portfolios or sub-advisers that provide us with access to customized managed investment portfolio options Investment management is provided on a discretionary or nondiscretionary basis. You may impose restrictions on the securities or types of securities in which you would like us to invest. We monitor your account at least quarterly. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio. We do not restrict our advice to limited types of products or investments. We offer a broad range of financial planning services: cash flow forecasting, trust and estate planning, investment consulting, insurance planning, retirement planning, risk management, charitable giving, and distribution planning. These services are only rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement. We offer an automated investment program, iDirect, with Charles Schwab & Company ("Schwab") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds and a cash allocation. We use the Institutional Intelligent Portfolios[®] platform offered by Schwab Performance Technologies ("SPT"), a software provider to independent advisers and an affiliate of Schwab, to operate the program.

Depending on your financial situation, resources, investment goals, and risk tolerance, we may recommend a portion of your assets to be invested in private placements offered through our Series LLC of private funds or unaffiliated private fund managers on a nondiscretionary basis.

For additional information, please refer to our <u>ADV Part 2A brochure</u>, especially <u>Item 4</u> (services) <u>Item 7</u> (clients and account minimums), <u>Item 13</u> (account monitoring) and <u>Item 16</u> (discretionary authority).

Additional questions to ask us:

How will you choose investments to recommend to me? Given my financial situation, should I choose an investment advisory service? Why or why not? 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?

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. The more assets you have in your advisory account, the more you will pay us.

We offer our services on a fee basis, which may include hourly and/or fixed fees, as well as fees based upon assets under management. We provide investment management services for an annual fee, which is negotiable in certain circumstances and varies between 0.40% and 0.95% depending upon the market value of the assets under management and the type of service. In addition to our fee, the Schwab automated investment program, iDirect, assess a 0.65% annual fee based on the assets under management. Our fees are prorated and charged quarterly, in advance, and automatically deducted from your account. Some investments (i.e., mutual funds, ETFs, private funds, etc.) impose additional transactional, management and/or administrative fees. In addition, the broker/dealer that holds your assets may charge you a transaction fee when we buy or sell an investment for you.

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, a fiduciary, 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 affect the recommendations we provide you. Here are some examples to help you understand what this means: allocating scarce investment opportunities to clients when we do not receive adequate allocations of securities, brokers furnishing us with their research based on the level of commissions we send them and using client commissions we generate to procure research.

For additional information, please refer to <u>Item 5</u> of our Form ADV brochure.

How do your financial professionals make money?

Our investment team professionals are compensated through salary and bonus. Bonuses are discretionary and reflect the overall success of the firm and the individual. Some of our financial professionals may receive additional compensation based, in part, on the profitability of the firm, individual performance and the amount of assets or revenue they raise for the firm in a particular year. These payment structures present conflicts of interest, as they could incentivize our financial professionals to recommend that you place additional assets under our management and to take more risks for potentially more gain. We mitigate that conflict by adhering to our fiduciary duty when making investment recommendations, so that we make recommendations in conformity with each client's investment objectives and savings strategy. You should discuss your financial professional's compensation directly with your financial professional.

Additional questions to ask us:

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

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No, our firm and our investment professions do not have legal; or disciplinary events. Visit <u>https://www.investor.gov/CRS</u> for free and simple search tool to research our firm and our firm's financial professionals.

Please ask us:

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

Item 5. Additional Information

For additional information about our investment advisory services, and to request a copy of Form CRS, please contact us at 210-736-7770 or visit our website, <u>www.1900wealth.com</u>.

Additional 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?