



**Brixton Capital Wealth Advisors is registered with the Securities and Exchange Commission as an Investment Adviser. Brokerage and investment advisory services and fees differ and that it is important for the retail investor to understand the differences. Brixton (BCWA) only provides advisory account services. 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.**

### **What investment services and advice can you provide me?**

We offer investment advisory services to retail investors, including portfolio management of individual securities as well as management of third-party investment managers that are offered on the Charles Schwab Platform. We only invest in publicly traded securities. BCWA monitors your account on at least a quarterly basis depending on the type of portfolio that you have. BCWA manages accounts on a discretionary basis meaning that you provide us with written authority to trade your account for you without contacting you prior to making investment decisions, as well as a non-discretionary basis—we consult you prior to making any investments. BCWA also provides Financial Planning services. BCWA generally has a minimum of \$100,000 but lower amounts are accepted on a case-by-case basis. We choose investments based upon your goals and objectives and the information that you provide to us. Additional information on our services can be found in our [ADV Item 4](#).

#### **Conversation starters - 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?**

### **What fees will I pay?**

On accounts with assets under \$3M, our annual fee for portfolio management services typically ranges from .50 to 1.75% of total assets under management. Assets over \$3M are negotiable based on facts and circumstances of the account. These fees are in addition to any fees that are charged by an EFT or Mutual Fund. Fees vary within these ranges depending upon the market value of your assets under our management, the type and complexity of the asset management services provided, as well as the level of administration requested either directly or assumed by the client. All fees are negotiated on a case-by-case basis and will be documented in writing on the investment management agreement that you sign at the time the account is opened. Fees are charged based upon the assets held in the account at the end of the quarter. Additional information can be found on [ADV Part 2 Item 5](#). BCWA holds most of its clients account at Charles Schwab Co., Inc. (Schwab), Schwab does not charge custody or maintenance fees, there are no transactions costs or commission on stock, Exchange Traded Funds (“ETF”) or mutual fund on Schwab One Source. Other mutual funds may have fees of up to \$49.95 per transaction. Bonds and options may have additional fees. Information about specific fees which are in addition to our advisory fees can be found at <https://www.schwab.com/pricing>.

BCWA also offers insurance products. These assets are not included in the assets under management, but because the commissions can range between 1% and 5%, Advisors who are registered as insurance agents have an incentive to recommend these products. Because BCWA receives more fees on higher account balances it does have an incentive to encourage clients to increase assets in accounts, which is a conflict of interest.

*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. Additional information on our fees can be found in [ADV Part 2 Item 5](#).*

#### **Conversation starters - 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 advisor?**

### **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.

BCWA makes money based upon the advisory fees that we charge you on a quarterly basis. We do not have any revenue sharing agreements and we do not receive any payment from Schwab in exchange for holding your account on their platform. Schwab does however provide the firm with reports, execution, and research. ADV Part 2 Item 5. Some of BCWA advisors are also registered with a non-affiliated broker dealer and do receive commission from business done at that other firm and not at BCWA and not at Schwab. Some advisors are also insurance registered or licensed with other insurance companies and receive commissions for any insurance products sold. This is a conflict of interest because they may receive higher commissions from these products than they do on advisory fees. You are under no obligation to purchase these products.

BCWA or persons associated with our firm can buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. Trades will be reviewed to ensure that the client gets the better price.

We recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest that you should be aware of. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services.

We also have a conflict of interest when recommending that you rollover a retirement account such as a 401k or IRA to a managed account, because we will receive a fee for managing these assets. You are under no obligation to rollover any assets.

**Conversation starters - Ask your financial professional:  
How might your conflicts of interest affect me, and how will you address them?**

### **How do your financial professionals make money?**

Our advisors receive a portion of the management fee that we receive on your assets that we manage for you or they work for us on a salary basis. Our advisors have a conflict of interest as in the more assets they manage the more they will be paid.

**Conversation starters- Ask your financial professional:  
As a Financial professional do you have any disciplinary history?**

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

Yes, Additional information on our advisors can be found at [investor.gov/crs](http://investor.gov/crs).

**Conversation starters - Ask your financial professional:  
Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer?  
Who can I talk to if I have concerns about how this person is treating me who can I talk to?**

**Additional information on the firm can be found at: [www.brixtonwealth.com](http://www.brixtonwealth.com) and [www.adviserinfo.sec.gov/](http://www.adviserinfo.sec.gov/).  
If you need additional information, please contact us at: 1305 Franklin Ave, Suite 300, Garden City, NY 11530  
or call us at 516.222.5300. Information on the team can be found at: <https://www.brixtonwealth.com/meet-your-team>.**