



## FIRM BROCHURE – FORM ADV PART 3

*This brochure provides information about client relationship summary of Christmas Corporation. If you have any questions about the contents of this brochure, please contact us at +1 424 645 5003 or by email at: [media@christmascorp.com](mailto:media@christmascorp.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 Christmas Corporation is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

Christmas Corporation  
SEC number : 801-107155  
CRD number : 282245

2081 Center Street  
Suite 120  
Berkeley, CA 94704

*Registration does not imply a certain level of skill or training.*

Version Date: Mar 2024

## ■ ITEM I: INTRODUCTION

Christmas Corporation is registered with the Securities and Exchange Commission (SEC) as an investment adviser. This document gives client a summary of the types of services and fees we offer. We are an investment adviser and provide advisory accounts and services rather than brokerage accounts and services. There are different ways client can get help with client's investments. Please be aware that investment advisory and brokerage services and fees differ, and it is important for client to understand these differences. Client may learn more about us and other investment advisers and brokers at no charge at [investor.gov/CRS](http://investor.gov/CRS).

## ■ ITEM II: WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

- We provide discretionary investment management services to individuals and institutions.
- We do not custody or take possession of your assets. When a client engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with client (unless client impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within client's account(s) consistent with client's investment objectives. Our authority over client's account(s) shall continue until our engagement is terminated.
- As part of our standard services, we review client's account continuously and monitor cash balances and all actively traded stocks held in client's portfolio daily.
- As a fiduciary, we are bound by law to act in the client's best interest. Unlike banks and brokerage firms, we do not sell insurance or financial products that charge a commission resulting in additional costs. Our firm provides fee-based investment services. When client does well, we do well.
- We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investment.
- The minimum account size that shall be accepted by us is ten thousand U.S. Dollars (US\$10,000) with no minimum subsequent investment amount. There is no minimum lock-up period. For additional information, please see Form ADV, Part 2A brochure Items 4, 7, 13, and 16.

**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 licenses, education, and other qualifications? What do these qualifications mean?*

## ■ ITEM III: FEES, COST, CONFLICTS, AND STANDARD OF CONDUCT

### A. What fees will I pay?

Christmas offers discretionary direct investment management services to advisory clients. Christmas charges an annual investment advisory fee according to the following schedule:

Clients	Annual Management Fee
U.S. Clients	2.00%
Non-U.S. Clients	2.00%

Asset-based portfolio management fees are calculated by the Custodian and withdrawn directly from the client's account on daily basis without client's written authorization. The daily fee is calculated as follows:

$$2.00\% \times (1/\text{trading days in a year}) \times \text{daily net asset value}$$

Trading days is estimated to be about 252 days in a year.

Christmas uses the value of the account as of the last business day of the billing period, after considering deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Christmas.

Neither Christmas nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Clients who are "Qualified Clients" as such term is defined by Rule 205-3 under the Investment Advisers Act of 1940, may otherwise elect to participate in our performance-based fee above a pre-determined hurdle rate fee structure (see Item 6 in our form ADV part 2A).

**Conversation Starters.** Ask your financial professional:

- *Help me understand how these fees and costs might affect my investments?*
- *If I give you \$500,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

## **B. What are your legal obligations to me when acting as my investment adviser and how does your firm make money?**

As a client's investment adviser and fiduciary, we always act in a client's best interests. Primarily, we benefit from the advisory services we provide to a client because of the advisory fees we receive from a client. At the same time, the way we make money creates some conflicts with a client's interests. As an example, we may recommend a particular custodian to custody a client's assets, and we may receive support services and/or products from that same custodian, certain of which assist us to better monitor and service a client's account while a portion may be for the benefit of our firm. Other potential conflict of interest would be that the more assets in a client's account(s), the more a client will pay in advisory fees. Therefore, we have an incentive to encourage a client to increase assets in his/her account. A client should understand and ask us about these conflicts because they can affect the investment advice, we provide a client.

Our investment management fees are fully disclosed and competitive with other full-service investment advisers. We do not partake in commissions or invest in commission-based products such as mutual funds with sales loads, annuities, insurance policies, mortgages, etc. We do not directly or indirectly compensate any person for client referrals.

**Conversation Starter.** Ask your financial professional:

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

#### ■ **ITEM IV: DISCIPLINARY HISTORY**

Christmas Corporation and its employees have not been subject to any legal or disciplinary events by regulators nor is it a party to any legal events material to client evaluation of our advisory business. We encourage client to visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) to research our firm 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 V: ADDITIONAL INFORMATION**

For additional information on our advisory services, see our brochures available at <https://adviserinfo.sec.gov/firm/summary/282245>. Client may contact our Chief Operating Officer at any time to request a current copy of your ADV Part 2A or our relationship summary. Our Chief Operating Officer may be reached by phone: +1 424 645 5003 or by email at [media@christmascorp.com](mailto:media@christmascorp.com).

**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 else can I talk to about my portfolio(s)?*

## **Exhibit A – Material Changes to Client Relationship Summary**

There are no material changes since the prior Client Relationship Summary.