

## Summary of Changes from Previous Version

The following changes have been made to this document from the previous version:

- Consolidation of separate Forms CRS for Albert Securities and Albert Investments into a single Combined Form CRS for both entities;
- Clarification of the scope of the services provided by Albert Investments as being solely portfolio management services;
- Clarification of what fees are excluded from the monthly service tier package fees;
- Clarification of which entity provides monitoring services and recommendations and which does not;
- Clarification of when a customer becomes a customer or client of each entity.



## Combined Relationship Summary (Form CRS) of Albert Securities, LLC and Albert Investments, LLC

March 29, 2024

### **Introduction**

Albert Securities, LLC (“AS”) is a licensed FINRA-member broker dealer. Albert Investments, LLC (“AI”) is an investment adviser registered with the SEC. Both AS and AI are wholly-owned subsidiaries of Albert Corp. (“AC” and together with AS and AI, “Albert”). The services of AS, AI, and AC are marketed and sold as a package to retail customers, and the three companies share employees and other resources. This relationship summary describes the respective services, fees, duties owed, and potential conflicts of interest, of AS and AI, which are different for each company. It is important for retail investors to understand those differences.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### **Relationships and Services**

AC offers via mobile app a package of investment-related and non-investment-related financial services to U.S.-based individual retail customers, including:

- Banking services, including savings and debit card accounts provided by unaffiliated bank partners;
- Budgeting assistance;
- Credit and identity theft monitoring;
- Insurance shopping assistance;
- Access to non-investment-related and impersonal educational investment-related financial advice via text message or (for a supplemental fee) video-conference;
- Automated transfer of funds to savings or investment accounts;
- Access to overdraft coverage (subject to eligibility);
- Brokerage services provided by AS; and
- Portfolio management services provided by AI.

AC offers the above services as part of different service tier packages with different monthly fee amounts, the composition and price of which may vary, but the investing-related services are always packaged together with other non-investing services and are not offered on a stand-alone basis. A schedule of the service tiers and prices currently offered is available at [albrt.co/pricing](https://albrt.co/pricing).

All AC customers who complete AS onboarding become customers of AS. AS customers can buy or sell whole or fractional shares of individual U.S. equity securities and/or portfolios of securities managed by AI. They can also set up recurring instructions to automatically purchase securities on a fixed schedule or when the customer has funds available in their bank account to invest. AS does not monitor accounts, accept discretionary authority over any accounts, or provide any investment recommendations. AS acts as an introducing broker only, and partners with Apex Clearing Corp. to provide clearing and custody services.

AS customers who purchase a portfolio managed by AI become clients of AI with respect to funds invested in that managed portfolio. AI's services include (a) selecting the securities to include in each managed portfolio and the relative weighting of each security in the portfolio, (b) maintaining an algorithm for determining which managed portfolio to recommend to each client based on the client's responses to an investor profile questionnaire completed during onboarding and periodically updated, and (c) maintaining an algorithm to monitor and automatically rebalance each client's portfolio when the relative weighting of its specified components drifts beyond certain predetermined tolerances. AI thus monitors, and maintains discretionary authority over, the portfolios it manages. AI monitors managed portfolios for rebalancing drift on a daily basis.

Because both AS's and AI's services are included as part of the service tier packages offered by AC, and AI clients do not pay separately for the brokerage services necessary to provide AI's services, AI's services are considered a *wrap fee program*. Because AI does not provide any additional forms of investment advice other than the services listed above, AI publishes a *wrap fee program brochure* instead of a *firm brochure* as part of its Form ADV, available [here](#).

Neither AS nor AI provide any services to any entities or trusts, nor to individuals without both a U.S. residence and social security number. Neither AS nor AI provide any services with respect to securities other than U.S. listed equities.

There is no minimum to open either an AS or AI account and customers and clients may invest as little as one to five dollars, depending on the portfolios and purchase methods currently offered.

*Conversation starters:*

- “Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?”

**Fees, Costs, Conflicts, and Standard of Conduct**

A. What fees will I pay?

The monthly service tier package fees are the same regardless of whether a customer makes any investments with AS or whether they choose to purchase a portfolio managed by, and become clients of, AI. With the exception of the Excluded Fees listed below, customers do not separately pay for the ancillary costs associated with using AS or the portfolio management services provided by AI, including brokerage commissions, custody fees, portfolio management fees, or other trading fees. They pay the same fixed monthly fee regardless of how much they invest, how frequently they deposit or withdraw funds, or how frequently they place orders or execute trades. The fee amounts are not negotiable, and are subject to change. AC may also charge less than the stated fee amounts at its discretion.

You will pay the monthly fee whether you make or lose money on your investments. The monthly fee reduces any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

*Excluded Fees.* The following fees and costs are expressly excluded from the monthly fee and are charged to clients separately if incurred:

- Supplemental fees for videoconference meetings;
- Fees charged by Apex Clearing Corp. to process the withdrawal of securities from an AS account via ACATS;
- Fees charged by Apex Clearing Corp. to wire funds or send a paper check (clients using ACH transfers that are not returned do not incur any additional fees);
- Fees charged by third-party banks or brokerage firms for returned checks or ACHs;
- Fees charged by Apex Clearing Corp. to send clients paper account statements (clients receiving electronic account statements do not incur any additional fees);
- Fees charged by the managers and administrators of the ETFs that are included in the managed portfolios, none of whom are affiliates of Albert.

*Conversation starter:*

- *“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?”*
- B. “What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?”

AS does not provide recommendations as your broker-dealer. When AI acts as your investment adviser, it must act in your best interest and not put its interests ahead of yours. At the same time, the ways AS and AI make money create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the services and investment advice we provide you. Here are some examples to help you understand what this means.

- *AI’s use of AS to provide brokerage services.* AI only uses AS to provide brokerage services. AI believes that AS provides the brokerage services needed by AI at a lower cost, and with higher quality, than any alternative broker, because AS services have been customized to the needs of AI’s clients. AI conducts best execution reviews of the execution services provided by AS and its executing broker to ensure that they are competitive with other brokers.
- *AS’s offering of AI managed portfolios.* AS only provides access to portfolios managed by AI and not by any third-party investment advisers. AS believes that the portfolios managed by AI provide diversified and low-cost options to its customers, and AS offers numerous ETFs as alternatives to AI-managed portfolios.
- *AC’s, AS’s and AI’s sharing of employees and other resources.* AC, AS and AI share employees and other resources, which allows information about their common customers and their investments to be shared among the three companies. Because none of AC, AS, or AI invest for their own account other than to facilitate fractional trading by their common customers, and none of them receive any compensation for selling any securities to their common customers, we do not believe this information sharing gives rise to any conflict.
- *Order routing.* AS receives a portion of payments for order flow paid by third-party wholesale execution providers to AS’s executing broker. Because all orders submitted to AS are “not held,” AS is not required to publish a firm-wide order routing disclosure report pursuant to Rule 606(a), but AS customers may request an individualized report of where their orders were routed pursuant to Rule 606(b). AS

- conducts best execution reviews of the execution services provided by its executing broker to ensure they are competitive with other executing brokers.
- *Fractional shares.* AS and AI allow customers and clients to purchase fractional shares of securities. Fractional shares cannot be transferred or sold without the assistance of AS. This can discourage customers from moving to another brokerage firm. Customers can transfer whole shares to other firms, and can liquidate their fractional shares at any time.
- *Principal trading.* In order to facilitate fractional trading, AS acts as principal in buying fractional shares sold by AS customers and by AI clients. AS mitigates any conflict of interest that may arise from acting as counterparty to AS customers or AI clients by pricing such trades at the midpoint of the National Best Bid/Offer at the time of the trade.

Additional details about these potential conflicts of interest are discussed in AI's Form ADV Part 2A Wrap Fee Program brochure, available [here](#).

*Conversation starter:*

- “How might your conflicts of interest affect me, and how will you address them?”
- C. “How do your financial professionals make money?”

All AS and AI financial professionals are also employees of, and solely compensated by, AC. AC pays those shared employees a fixed salary and discretionary bonus that is not contingent on any of: the amount of clients or customers they service; the time and complexity required to meet a client's needs; the product sold; product sales commissions; or revenue the firm earns from the financial professional's advisory services or recommendations.

### **Disciplinary History**

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

No. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research AS, AI and their financial professionals.

*Conversation starter:*

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

### **Additional Information**

Additional up-to-date information about AS's and AI's services, and copies of this Form CRS, are available at [albert.com](https://albert.com), by texting Support in the Albert mobile app, by emailing [support@albert.com](mailto:support@albert.com), or by calling 844-891-9309.

*Conversation starter:*

- “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?”