

FORM CRS

centerfin is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, 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. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

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

We offer the following investment advisory services to retail investors: **Portfolio Management Services; Sponsor and Manager of Wrap Fee Program.** We operate as an internet advisor and manage your assets in a wrap fee program on a *discretionary* basis whereby we will decide which investments to buy or sell for your account through an automated and interactive web-based process. Our wrap fee program is an asset allocation program in which clients are charged one fee for transactions and portfolio management. Model portfolios, which are constructed based on your investment objectives, are typically invested in ETFs and mutual funds, however depending on market conditions and your financial profile we may use other securities such as bonds and equities. As part of our standard service we will monitor your investments on a quarterly basis.

**Account Minimums and Requirements:** In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 and Form ADV Part 2 Appendix 1 Brochures Items 4 and 5 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/306461>

***Key Questions to 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?**

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

- **Wrap Program Fees - Asset Based fees** Payable monthly in arrears, based on the average daily balance. Our annual portfolio management fee is 0.50% for all clients. Asset-based fees associated with a wrap fee program generally include most transaction costs and fees to a broker-dealer that has custody of the assets. Our model portfolios include investment in ETFs and mutual funds. These products may have additional fees and expenses which are not included in our fee.

Since our firm pays the transaction costs associated with securities transactions in your account, we have an incentive to minimize the trading in your account.

Examples of the most common fees and costs applicable to our clients are:

- Certain accounts or services that are outside the scope of typical investment activity may require additional charges by our custody broker dealer.

***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 detailed information, refer to our Form ADV Part 2A, Items 5 and 6 and Form ADV Part 2 Appendix 1 Brochures by clicking this link <https://adviserinfo.sec.gov/firm/brochure/306461>

***Key Questions to 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.

- We act as the investment adviser to a mutual fund. Where appropriate, we will exercise our discretionary authority and without further approval from you, we may invest a percentage of your assets in the mutual fund. This creates a conflict of interest.

***Key Questions to Ask Your Financial Professional***

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

Refer to our Form ADV Part 2A and Form ADV Part 2 Appendix 1 Brochures by clicking this link <https://adviserinfo.sec.gov/firm/brochure/306461> to help you understand what conflicts exist.

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

The financial professionals at our firm are compensated based on individual performance and the growth of the business. Compensation includes base salary, bonus and non-cash compensation. As the financial professionals' compensation is based on our firm's profitability and because our revenue is derived from asset-based fees, we have an incentive to grow your account as much as possible.

This is a conflict of interest because our financial professionals have an incentive to encourage you to increase your assets in your accounts and recommend our advisory services to you.

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

No, our firm and our financial professionals currently do not have any legal or disciplinary history to disclose. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple research tool.

***Key Questions to Ask Your Financial Professional***

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 917-747-1517 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/306461>

***Key Questions to 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?**