

## AGHAZ INVESTMENT ADVISORS, LLC FORM ADV, PART 3 (CRS) INTRODUCTION

Aghaz Investment Advisors, LLC ("Aghaz," the "Adviser," the "Firm," the "Company," "we," "us" or "our") is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the 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.

### *What is the difference between a Broker and an Adviser (like Aghaz), and how do fees differ?*

An **investment adviser** is generally any entity that provides investment advice or conducts securities analysis in exchange for a fee, typically based on the portfolio's total value. In contrast, a **broker-dealer** is a firm that acts as an intermediary between buyers and sellers of securities for which they will usually receive a commission, which is paid per transaction.

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

Aghaz is an investment adviser that is registered with the U.S. Securities and Exchange Commission (the "SEC") pursuant to the Investment Advisers Act of 1940, as amended (the "Advisers Act"). The Company is classified as a registered investment adviser under the SEC Rule 203A-2(e) ("Exemption from Prohibition on Commission Registration") of the Advisers Act (otherwise known as a "robo-advisor"), which creates an eligibility to operate as a registered investment advisor, provided the elements of that rule are met. Toward this end, the Company's investment management services are offered online only to individual separate accounts (each a "Client" and collectively, "Clients").

- The Firm is a Shariah-compliance advisory firm. To be Sharia compliant, companies and investments must pass several screens for permissible asset classes and business activities. A business activities screen excludes companies that derive more than five percent of their total income from non-compliant income sources. Non-Compliant Income Sources include Alcohol, Gambling, Weapons, Tobacco, Adult Entertainment, Pork Products, Highly leveraged Businesses, Interest-Based Businesses, Music, Cinema or Broadcasting.
- Aghaz advisory services consist of portfolio management to clients under a wrap fee program as sponsor and portfolio manager. A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. The Company provides robo-advisory portfolio management to clients under this wrap fee program as sponsor and portfolio manager via an online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client's age, risk tolerance, income, and current assets, among others. Aghaz generally is responsible for investing and re-investing the assets of each Client account in accordance with the investment objectives, policies and guidelines set forth in the Client's governing documents. Aghaz will not select outside portfolio managers for management of its wrap fee program. Aghaz will be the sole portfolio manager for the wrap fee program. In summary, Aghaz provides the following advisory services:
- Discretionary Investment Management, except as otherwise set forth in any applicable Client Agreement. Our clients authorize Aghaz to investigate, purchase, and sell on behalf of Client, various securities and investments. Aghaz is authorized to execute purchases and sales of securities on Client's behalf without consulting Client regarding each sale or purchase. Client may, however, terminate the discretionary authority of Aghaz immediately upon written notice. Non-Discretionary Investment Management. In these types of Client Agreements, Aghaz is authorized to execute purchases and sales of securities only after securing permission from Client regarding each transaction.

For additional information, please see Items 4, 7, 8, and 13 of our Form ADV Part 2A brochure here:

<https://adviserinfo.sec.gov/firm/summary/308500>

*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?

Aghaz's fees are fixed. The fixed fee will be a subscription fee of \$2 per month, plus 0.49% per year. Fees are paid in arrears. Clients may terminate the agreement without penalty, for full refund of Aghaz's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice. Aghaz typically collects its fees in arrears. However, in very limited instances with clients, as outlined in the agreement, Aghaz collects its fees in advance and quarterly. Asset-based portfolio management fees are withdrawn directly from the Client's accounts with Client's written authorization on a quarterly basis. Aghaz typically collects its fees in arrears. Clients enrolled in our wrap fee program will only pay Aghaz a wrap fee that covers both Aghaz's investment advisory services and the related unaffiliated brokerage services. **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 additional information, please see Item 5 of our Form ADV Part 2A brochure here:

<https://adviserinfo.sec.gov/firm/summary/308500>

*Conversation Starter. 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.

The Company and its personnel serve as the portfolio managers for all wrap fee program accounts. This is a conflict of interest in that no outside adviser assesses Aghaz's management of the wrap fee program. However, Aghaz addresses this conflict by acting in its clients' best interest consistent with its fiduciary duty as sponsor and portfolio manager of the wrap fee program.

Standards of Conduct: Aghaz and its access persons are expected to comply with all applicable federal and state laws and regulations. Access persons are expected to deal with Clients fairly and disclose any activity that may create an actual or potential conflict of interest between them and Aghaz or Client.

Aghaz does not recommend that Clients buy or sell any security in which a related person to Aghaz or Aghaz has a material financial interest. From time to time, representatives of Aghaz may buy or sell securities for themselves that they also recommend to Clients. This may provide an opportunity for representatives of Aghaz to buy or sell the same securities before or after recommending the same securities to Clients resulting in representatives profiting off the recommendations they provide to Clients. Such transactions may create a conflict of interest. Aghaz will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the Client's disadvantage when similar securities are being bought or sold.

*Conversation Starter. Ask your financial professional:*

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

For additional information, please see Items 4, 5, 6, 10, and 11 of our Form ADV Part 2A brochure here:

<https://adviserinfo.sec.gov/firm/summary/308500>

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

Neither Aghaz nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds. For an additional discussion of other compensation, please refer to Item 14 - Client Referrals and Other Compensation of our Form ADV Part 2A Brochure. Neither Aghaz, nor any representatives of Aghaz receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, Aghaz may have a financial incentive to recommend the wrap fee program to clients.

For additional information, please see Item 14 of our Form ADV Part 2A brochure here:

<https://adviserinfo.sec.gov/firm/summary/308500>.

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

No. You can go to [Investor.gov/CRS](https://www.investor.gov/crs) and use the free and simple search tool 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?"*

For additional information, please see Item 9 of our Form ADV Part 2A brochure here

<https://adviserinfo.sec.gov/firm/summary/308500>

#### Additional Information

For additional information about our services, see our Disclosure Brochure (Form ADV Part 2A) and Customer Relationship Summary (Form CRS) brochure at <https://adviserinfo.sec.gov/firm/summary/308500>, as well as the Brochure Supplement (Form ADV Part 2B) and Investment Advisory Agreement your financial professional provides. You can reach us by email at [info@aghazinvest.com](mailto:info@aghazinvest.com) or by phone (425) 202-6196 to request up-to-date information and a copy of this relationship summary.

*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 can I talk to if I have concerns about how this person is treating me?"*