

March 2024

Catherine Avery Investment Management, LLC ("CAIM") is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. 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?

CAIM offers investment advisory services to retail investors. We offer portfolio management, financial planning services, and sub-advisory services. Our investment offerings are limited to equities, fixed income, mutual funds, exchange traded funds (ETFs), real estate, hedge funds, REITs, private placements and government securities. CAIM does not offer proprietary products. We monitor client portfolios on an ongoing basis and make adjustments consistent with their investment objectives and goals. We do not make adjustments based on market timing but will periodically rebalance or tax loss harvest when necessary. For discretionary investment accounts, the client gives us the authority to make trades when we feel it is appropriate, without consulting the client in advance, which may be subject to certain limitations such as investment mandates, required minimum distributions, and other required events. The firm in its sole determination may have legacy non-discretionary agreements but does not currently offer non-discretionary investment accounts, where the client must give us specific approval before we make any trades. Non-discretionary accounts limit our ability to proactively manage the account. The client agreement will specify the type of account a client has with us. We do not require a minimum account size.

When CAIM acts as a subadviser to advisers unaffiliated with CAIM, these third-party advisers are outsourcing portfolio management services to CAIM, and this relationship is memorialized in a contract between CAIM and the third-party adviser.

While we do not accept custody of client assets, we work with qualified custodians.

For additional information about the services we provide, please see our Form ADV Part 2A Item 4 and Item 7 of our Firm Brochure, which is available at <https://adviserinfo.sec.gov/firm/summary/144946>.

- 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?

Our fees are based on a percentage of client assets that we manage and do not vary based on investment type. We typically deduct fees from clients' investment accounts. We charge our fees quarterly in advance of up to 0.3125% (1.25% annually). The more assets you have in the account(s), including cash, the more you will pay us, and therefore we have an incentive to encourage you to increase the assets in your account(s) in order to increase our fees.

When CAIM acts as a subadviser to unaffiliated third-party advisers CAIM receives a share of the fees collected from the third-party adviser's client.

Fees for creating a client's financial plan is \$2,500 for existing clients and \$5,000 for non-clients. The fees are negotiable.

Our fees are separate from any fees or expenses assessed by outside parties including fees related to investments such as mutual funds, ETFs and product level fees. You will incur a transaction fee when we buy and sell an investment for you. You will also pay fees to an unaffiliated custodian that will hold your assets. CAIM does not receive or share in any compensation related to these outside charges and fees.

You will pay fees and costs whether you make or lose money on your investments, and 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 about the fees we charge, see Form ADV, Part 2A Item 5 of our Firm Brochure, and our Investment Advisory Agreement, which is available at <https://adviserinfo.sec.gov/firm/summary/144946>.

- 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 as a fiduciary 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 affect the investment advice we provide you. Here are some examples to help you understand what this means.

The Firm permits its employees to participate employee personal trading and are permitted to buy or sell securities that they also recommend to clients. There is a possibility that employees might benefit from market activity by clients in a security held by an employee. The Firm has adopted a Code of Ethics designed to mitigate potential conflicts of interest and improprieties, and maintains records as required under the Advisers Act.

For additional information on conflicts of interest and how they are managed, please see our Form ADV, Part 2A Item 11 of our Firm Brochure, which is available at <https://adviserinfo.sec.gov/firm/summary/144946>.

- Key questions to 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 financial professionals are compensated in the form of a quarterly payment based upon an agreed percentage of the amount of client assets they service, as well as discretionary annual bonuses based on criteria such as merit, employee performance, market performance, etc. Professionals may receive compensation for earning new client business or expanding current relationships in the form of discretionary quarterly bonuses. CAIM does not compensate financial professionals employed by the Firm on a per transaction basis.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our professionals.

- Key questions to ask your financial professional:

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

ADDITIONAL INFORMATION ABOUT OUR SERVICES

For additional information about our services please visit our website www.caimllc.com. If you would like additional, up-to-date information or a copy of this disclosure, please call (941) 388-7249.

- 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?