

March 2024

**Capital Trust Advisors**  
Client Relationship Summary  
Form CRS/Form ADV, Part 3

Goldberg Advisers, LLC also doing business as Capital Trust Advisors is registered with the Securities and Exchange Commission as an investment advisor. Brokerage and investment advisory services and fees differ and it is important 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 advisors, and investing.

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

**Investment Advisory Services:** Using the name Capital Trust Advisors ("CTA") we provide continuous advice to clients regarding the investment of client funds. Our wealth management services include asset allocation, investment management, financial and retirement planning and net worth/cash flow planning. We tailor our advisory services to our clients' individual needs based on meetings and conversations with each client. While we generally expect that our clients' investments are mutual funds and exchange traded funds, we do not restrict our advice to limited types of products or investments.

Our investment advisory services are offered on a discretionary basis which means we don't need to call you when buying or selling in your account. You give us this authority when you sign our investment management agreement. This agreement will remain in place until you or we terminate it. If clients wish to impose certain restrictions on investing in certain securities or types of securities, we will address those restrictions with the client to have a clear understanding of the client's requirements. Written documentation of this understanding will be kept in the client file.

Our retail clients are individuals and their retirement accounts. Generally, our minimum account size is \$500,000 although this may be waived based on other considerations such as the account's relationship to existing clients and other factors.

Our clients' accounts are reviewed on a monthly basis by John Goldberg, Managing Member, Sanford Lowengart, Head of Trading and/or Paul Evans, Portfolio Manager.

**Financial Planning Services:** Financial planning involves an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. John Goldberg reviews financial plans with clients annually.

Additional information about our services is located in Items 4, 13 and 16 of our [Firm Brochure](https://adviserinfo.sec.gov/firm/brochure/134174). (adviserinfo.sec.gov/firm/brochure/134174).

**Conversation Starters**

- ✓ 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?**

You will be charged an ongoing annual fee, billed in quarterly installments. This fee is based on your account value as of the last day of each calendar quarter. Our fees vary based on your assets under management and go up to 1.50%. Financial planning services are included in the management fee. The more assets you have in your advisory account, the more you will pay us. This gives us an incentive to encourage you to increase the assets in your account which will increase our fees.

We may negotiate the amount of your fee depending upon circumstances including but not limited to account composition and complexity; other client employee or family relationships; or other conditions which may result in different fees being charged by us for client accounts similar in composition and objectives. Our employees and their family related accounts may be charged a reduced fee, or no fee, for our services.

The broker/dealer (custodian) that holds your assets can charge you a transaction fee when we buy or sell an investment for you. The broker/dealer's transaction fees are in addition to our fee for advisory services. You may also pay charges imposed by the broker/dealer holding your account for certain investments and maintaining your account. Some investments, such as mutual funds, index funds, exchange traded funds, and variable annuities charge additional fees that will reduce the value of your investments over time.

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. Additional information about these fees and costs may be found in Items 5 and 12 of our [Firm Brochure](#).

#### Conversation Starters

- ✓ Help me understand how these fees and costs might affect my investment. 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 advisor? 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 recommend Charles Schwab & Co., Inc. to serve as custodian to our clients. Schwab provides us with certain products and services at no cost that benefit us but do not benefit our clients. Certain of these products and services assist us in managing and administering our clients' accounts and others help us develop our business. The receipt of these products and services creates a conflict of interest because it gives us an incentive to have clients choose Schwab as a custodian.

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#### Conversation Starters

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

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

Compensation for our financial professionals is based on the fees for the clients managed by each of our financial professionals. As such, they are incentivized to increase the assets in your account which will increase the compensation they receive. No commissions or other incentives are received.

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

Yes. [Investor.gov/CRS](https://investor.gov/CRS) is a free and simple search tool to research Capital Trust Advisor and our financial professionals.

#### Conversation Starters

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

#### Additional Information

Additional information about our investment advisory services is available in our [Firm Brochure](#) and our [website](#). You may request a current copy of this relationship summary at (415) 399-9100 or download it [here](https://adviserinfo.sec.gov/firm/summary/134174) (adviserinfo.sec.gov/firm/summary/134174).

#### Conversation Starters

- ✓ Who is my primary contact? 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?

April 2023 ~~March~~ 2024

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

Yes. ~~Our firm does not have any legal or disciplinary history, but some of our financial professionals do.~~ [Investor.gov/CRS](https://www.investor.gov/CRS) is a free and simple search tool to research Capital Trust Advisor and our financial professionals.

#### Conversation Starters

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