

Part 3 of Form ADV – Form CRS AKA *Relationship Summary*: Spielberg & Brooks, Inc.

Item 1. Introduction

Spielberger & Brooks, Inc. (S&B)
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Spielberger & Brooks, Inc. is an investment advisory firm registered with the Securities Exchange Commission. 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://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisors, and investing.

Item 2. Relationships & Services – What investment services and advice can you provide me?

Spielberger & Brooks, Inc. provides Investment Advisory Services which on occasion may be referred to as Financial Planning to high net worth individuals. Advisory services are available to individuals with a minimum size of \$250,000 in assets.

Portfolios are tailored to the individual needs of clients, based on income needs and appetite for risk. S&B has full discretion on clients accounts, meaning we have the authority to trade in and out of positions without asking permission from each individual client as long as it is in their best interest. Clients also maintain discretion and are able to trade positions in their accounts, but this is rare and not recommended.

For more detailed information about S&B's services, please visit our Form ADV Part 2A Brochure (Items 4 and 7)

Methods of Analysis:

Charting - A method of evaluating securities based on plotting points on different types of charts that look at past volume and prices which indicate certain buy or sell trends.

Fundamental Analysis - A method of evaluating a security that entails attempting to measure the intrinsic value by analyzing macroeconomic factors (ex. the overall economy and industry conditions) and company specific factors (ex. financial condition and management).

Technical Analysis - A method of evaluating securities by analyzing statistics generated by market activity such as past prices and volume. This type of analysis is based on the belief that historical performance of markets and equities is an indication of future performance.

Investment Strategies:

Long term purchases - Securities that are purchased and held for at least one year

Short term purchase - Securities that are purchased and sold within one year

Option writing (includes covered options, uncovered options, or spreading strategies) - Covered options is the option strategy that S&B utilizes on most occasions. This type of strategy is used to minimize losses while limiting some upside potential.

Trading - Securities purchased and sold within 30 days

Short Sales - A short sale is generally the sale of a stock that the investor does not own. Investors who sell short believe the price of the stock will fall. If the price drops, the investor can buy the stock at a lower price and make a profit. If the price of the stock rises and the investor buys it back later at a higher price, a loss would be incurred.

Margin Transactions - Allows an investor to buy securities with borrowed cash from their broker, using their other securities as collateral. This type of transaction can magnify profits or losses.

Spielberger & Brooks utilizes the investment strategies above to help client's minimize risk and to maximize potential gains. Although, S&B always strives to increase client's assets, the potential of risk and the loss of money still exists while utilizing S&B's strategies.

Item 2. Relationships & Services (Continued)– What investment services and advice can you provide me?

Account Monitoring:

Holdings of all client accounts are continuously reviewed. An account relationship review is conducted quarterly or more frequently as necessary to respond to significant changes in economic or market conditions or if a client informs us of changes in their financial circumstances or investment objectives. Spielberger & Brooks officers work together to review all client accounts. This is done on a portfolio analysis basis.

Clients receive quarterly portfolio evaluations from the Spielberger & Brooks including portfolio appraisals and performance history statements. In addition, clients receive monthly/quarterly holding and transaction activity statements directly from investment custodians.

Q & A

Given my financial situation, should I choose an investment advisory service?

If you are looking for expert management of your portfolio where we as the advisor will take into account your goals and cash needs, then the answer is yes. If you are looking for a partner to help you navigate complex financial situations, answer questions as they come up and continue to provide you with comprehensive financial planning, then the answer is yes. If you are looking for Peace of mind knowing a professional is monitoring the market and your portfolio, and making needed changes, then the answer is yes. If you are sensitive to paying a management fee for this type of service and feel that you have the expertise to manage a portfolio, then the answer may be no.

How will you choose investments to recommend to me?

We choose investments based on your risk tolerance, diversification of assets, and in certain cases investments that are inversely correlated to your portfolio.

**What is your relevant experience, including your license, education, and other qualifications
What do these qualifications mean?**

Mark Spielberger - President/CEO

Prior to starting Spielberger & Brooks, Inc. Mr. Spielberger created and was the President of The Spielberger Group. Mark Spielberger created and was President of Spielberger Dampf Brill & Levine LLC. as well for over 11 years prior to starting the The Spielberger Group. Before his days at Spielberger Dampf Brill & Levine LLC. Mr. Spielberger created and was named Director in charge of the Private Advisory Services Group, (PAS) at the Chase Manhattan Private Bank (previously Chemical Private Bank) for over 15 years. Mr. Spielberger headed up a dedicated team of investment professionals managing over \$500 million in the bank's investment Allocation Program. Prior to joining Chemical's Private Bank, Mr. Spielberger began the Personal Financial Planning Program at Shearson Loeb Rhoades. Mr. Spielberger holds a B.S. (Beta Gamma Sigma) and M.B.A. in Taxation and Investments and Securities from New York University

Item 2. Relationships & Services (Continued)– What investment services and advice can you provide me?

Craig Brooks - Managing Partner/ Chief Compliance Officer

Prior to starting Spielberger & Brooks, Craig was a partner at The Spielberger Group. Before his days at The Spielberger Group, he was employed by Spielberger Dampf Brill & Levine, LLC. Craig received his BBA from The George Washington University in 2001, graduating with honors. While attending The George Washington University, Craig was one of the persons responsible for starting the National Business Fraternity, Delta Sigma Pi. Craig received his MBA with distinction in Finance from Hofstra University in 2011. Craig is a licensed Life and Health Insurance Agent in the state of New York.

Item 3. Fees, costs, conflicts, and standard of conduct – What fees will I Pay?

Principal Fees: Management fees are paid quarterly in arrears. See below for our fee schedule:

Asset Level	Base Fee +	Annual Percentage
\$250,000 – \$500,000	\$3,125	1.25% on balance over \$250,000
\$500,000 – \$2M	\$6,250	.75% on balance over \$500,000
\$2M – \$4M	\$17,500	.60% on balance over \$2M
\$4M – \$6M	\$29,500	.40% on balance over \$4M
\$6M – \$8M	\$37,500	.30% on balance over \$6M
\$8M +	\$43,500	.20% on balance over \$8M

Other Fees and Costs: Transaction fees are charged by Charles Schwab to buy and sell stock options. When purchasing some mutual funds, Schwab may charge a fee. Mutual funds and ETF's also carry an expense ratio which is paid by the client.

Note: Clients will pay fees and costs whether they make or lose money on 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 more detailed fee information, please visit our Form ADV Part 2A (Item 5)

Q & A

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?

*The entire \$10,000 is invested because we do not charge fees until the end of the quarter. At that time, you will be charged 1.25% of the total assets. For example if the account value doesn't increase or decrease your fee for the quarter will be \$31.25 ($\$10,000 * 1.25/4 = \31.25). All returns are net of our fees and investment fees.*

Item 3. Fees, costs, conflicts, and standard of conduct – 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. The way some advisors make money creates some conflicts with client's interests. You should understand and ask about these conflicts because they can affect the investment advice provided. We feel as if there are no conflicts of interest in working with us. Our fee is based on the value of your account. We do not charge commission of any sort

Q & A

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

As stated above, we feel that our method of being compensated does away with conflicts of interest. If the account value increases, our fee will increase as well. If the account value, decreases, our fee will also decrease. Our main objective is to increase the value of your account. Our main goal is to buy you the best quality investments possible which hopefully in turn will give you the best returns.

Item 3. Fees, costs, conflicts, and standard of conduct – How do your financial professionals make money?

Mark Spielberger & Craig Brooks are the only two financial professionals/partners that comprise Spielberger & Brooks, Inc. The firm is ONLY compensated through fees that are charged quarterly based on the assets being managed at the time. Those fees are then disseminated to each partner.

Craig Brooks is a registered Life and Health insurance agent in the state of New York. From time to time he is compensated for selling life insurance policies. This revenue is separate from Spielberger & Brooks, Inc.

Item 4. Disciplinary History – Do you or your financial professionals have legal or disciplinary history?

No. None of our financial professionals currently have or have had any disciplinary actions against them.

Although this information does not pertain to our firm, it can be found in the following places:

- Disciplinary information in Form ADV (Item 11 of Part 1A or Item 9 of Part 2A)
- Disclosures for any financial professionals in Items 14A-M of Form U4 or Items 7A or 7C-F of Form U5

Q & A

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

No.

Investors are encouraged to visit Investor.gov/CRS for a free and simple tool to research the firm and its financial professionals.

Item 5. Additional Information

Retail Investors can find additional information about Spielberger & Brooks by visiting our website at www.spielbergerbrooks.com. A copy of the *relationship summary* can be requested by either emailing or calling Craig Brooks at: craig@thespielbergergroup.com or 516-605-2222.

Q & A

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?

Your primary contact person is usually the investment advisor who was responsible for starting the client-advisor relationship. However, at Spielberger & Brooks, please feel free to reach out to either Mark Spielberger or Craig Brooks to discuss your portfolio or any other issues.

