

## **FEBRUARY 7, 2024: FORM CRS (CLIENT RELATIONSHIP SUMMARY)**

### **A SUMMARY OF YOUR ADVISORY RELATIONSHIP WITH WHIPPLEWOOD ADVISORS, LLC**

WhippleWood Advisors, LLC (“WhippleWood”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is essential for you to understand these differences. Free and simple tools are available to research firms and our Financial Professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## **ITEM 2 - RELATIONSHIPS AND SERVICES**

### **WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?**

WhippleWood offers investment advisory services to retail investors on a discretionary and non-discretionary basis. In a discretionary account, you have granted written investment authority to your Financial Professional to execute purchase and sell orders in your advisory accounts without consulting with you first. You may limit our discretion, such as by imposing reasonable restrictions on investing in certain securities or groups of securities. In a non-discretionary account, you have not granted written trading authority to your Financial Professional, and he or she will consult with you before executing trades in your account. As the retail client, you make the ultimate decision regarding the purchase or sale of your investments. Our Firm monitors your investment advisory accounts, and specific investments within your accounts, on an ongoing basis to align with your investment goals. This service is included as part of the Firm’s standard advisory services. Our Firm does not require a minimum dollar value of any account to which it provides advisory and financial planning services. If deemed appropriate for you, our Firm will recommend utilizing an independent Third Party Money Manager (“TPMM”) to aid in the implementation of investment strategies for the client’s portfolio. We promote clients on behalf of StoneCastle Cash Management, LLC and receive payment in the form of an annual referral fee based on the daily balance of accounts we have referred to StoneCastle. This creates an economic incentive for us to encourage you to invest with StoneCastle Cash Management, LLC. We will only recommend this investment if we think it is appropriate for your financial situation. Financial Planning services can be provided on a stand-alone basis or in conjunction with our investment management services. Our Firm provides general investment recommendations, on a limited basis to our clients. In a consulting engagement, you will be required to select your own investment managers, custodian, and/or insurance companies for the implementation of consulting recommendations.

### **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?

**FOR MORE INFORMATION REFER TO OUR FIRM’S ADV PART 2A BROCHURE - ITEM 4, 7, 13 AND 16**

## **ITEM 3 - FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT**

### **WHAT FEES WILL I PAY?**

Our Firm receives a fee as compensation for providing investment advisory services and financial planning services on your account. The investment management fee includes investment management supervision, financial planning, trade entry, and other account maintenance and/or service activities. Our investment management fees are based on a percentage of the total account value. For new clients, our maximum annual investment advisory fee is 1.15%, billed in arrears on a quarterly basis. You pay this fee even if you don’t buy or sell investments. The more assets in your advisory account, the more you will pay in fees, and therefore, the Firm has an incentive to encourage you to increase the asset value in your account. The custodian will charge transaction costs, custodial fees, redemption fees, retirement plan and administrative fees, or commissions. Our other Firm fees are billed as follows: For TPMM, fees and billing methods are outlined in each respective TPMM’s Brochure and Advisory Contract. You pay an ongoing fee directly to the TPMM based upon a percentage of your assets under management with respect to each TPMM. Fees for Financial Planning and Consulting Services may vary based on the extent and complexity of the consulting project and may be negotiated with the advisor. 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.

### **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?

**FOR MORE INFORMATION REFER TO OUR FIRM’S ADV PART 2A BROCHURE - ITEM 5**

**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. 1) Asset-based fees present a conflict because our Firm is incentivized by encouraging you to invest additional funds in your advisory accounts. 2) Some of our IARs are engaged in an existing promoter relationship with another independent investment adviser (RIA), in which the IAR receives compensation from the independent RIA for past referral of clients to their Firm. Effective in 2023, IAR's of WWA's will cease to serve as a promoter of new business away from WhippleWood Advisors. 3) We promote clients on behalf of an unaffiliated financial institution(s) and receive payment in the form of an annual referral fee based on the daily balance of accounts we referred. This creates an economic incentive for us to encourage you to invest with these firms. We will only recommend investment(s) if we think it is appropriate for your financial situation. 4) Our firm allows our Financial Professionals to invest in the same securities as you; therefore, our Financial Professionals may have an incentive to favor their personal accounts over your advisory account. 5) Some of our firm's financial professionals are registered representatives of an unaffiliated broker-dealer, and they may offer you brokerage services through the unaffiliated broker-dealer or advisory services through our firm. Registered representatives charge a transaction-based commission each time they buy or sell a security in a brokerage account. As a result, they have an incentive to trade as much as possible in order to increase their compensation. 6) Lastly, some of the products, services and other benefits provided by your custodians are used in servicing all of our Firm's advisory accounts and therefore may not directly benefit your advisory account. If you have questions about whether any of these situations could apply to your investments, ask your Financial Professional.*

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

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

**FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 5, 10, 11, AND 14**

**HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

Our Firm's Financial Professionals are compensated by the investment services fees as described above in Item 3 Fee section. This compensation is based on the amount of assets they service, the amount of time spent, and the complexity required to meet the client's needs or revenue based on the recommendations provided by our Financial Professionals. Some of our Financial Professionals are insurance licensed and receive commissions, trails, or other compensation from the respective insurance companies as a result of effecting insurance transactions. However, you have the right to decide whether to act on the recommendation. We recognize our duty to place your interests first and have established policies in this regard to avoid any conflicts of interest. When our Financial Professionals act as a registered representative of a broker-dealer, our Financial Professionals receive commissions in connection with the transactions made in your account. While some of our Firm's Financial Professionals are engaged in outside business activities, we are required to disclose material outside business activities and any conflict it may pose to you. Our Firm supervises the business activities of our Financial Professionals through our compliance program. All Financial Professionals are required to follow a Code of Conduct to mitigate any conflicts to you.

**FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 5, 10, 11, AND 14**

**ITEM 4 - DISCIPLINARY HISTORY**

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

Yes. Visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- ☒ As a Financial Professional, do you have any disciplinary history? For what type of conduct?

**FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 9**

**FOR ADDITIONAL INFORMATION ABOUT OUR SERVICES OR AN UP TO DATE COPY OF THIS  
CLIENT RELATIONSHIP SUMMARY, PLEASE CONTACT:**

**11852 SHAFFER DRIVE, BUILDING B | LITTLETON, CO 80127 PHONE: 303-989-7600 | TOLL FREE: 800-553-9003**

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- ☒ Who is my primary contact person? Is he or she an investment adviser or a representative of a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

## MATERIAL CHANGES

Updates since our last filing dated March 7, 2023:

Under item 2 – the following language was added: Financial Planning services can be provided on a stand-alone basis or in conjunction with our investment management services.