

Invariant Investment Management LLC 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://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?***

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We offer investment advisory services to retail investors, which principally include discretionary and non-discretionary portfolio management, financial planning, and sub advisory services. Our discretionary authority to buy, sell, and otherwise transact in securities in your account(s) is granted in our advisory agreement and is only limited by your reasonable restrictions or our mutual ability to terminate the advisory agreement. When providing non-discretionary advisory services, you make the ultimate decision regarding the purchase or sale of investments. We only offer advice with respect to certain types of investments, which generally include mutual funds, equities, fixed income securities, exchange traded funds, real estate funds (including real estate investment trusts, or "REITs"), non-U.S. securities, commodities, and insurance products including annuities. We do not have a minimum account size or investment amount to retain or maintain our advisory services.

Regular monitoring of your account(s) is included as part of our standard portfolio management and sub advisory services, with reviews typically occurring at least quarterly. It is important that you keep us apprised of your financial situation so we can conduct more frequent reviews if necessary.

More detailed information about our services may be found in [Items 4 and 7 of our Form ADV Part 2A brochure](#).

#### **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?***

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Retail investors will generally incur the following fees charged by us: portfolio management and subadvisory fees based on a percentage of your assets under our management (which generally range up to 1.50% per annum) or financial planning fees charged at a fixed rate as quoted based on the nature and complexity of services rendered. Portfolio management and subadvisory fees are charged quarterly in advance and fixed fees are generally charged upon delivery of the financial plan. In addition, retail investors will also generally incur the following fees and costs charged by third-parties: custodian fees, account maintenance fees, product expenses such as internal expense ratios, and transaction charges.

When we charge an asset-based fee, the more assets there are in your account(s), the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account(s). When we charge a fixed fee, our fees are typically correlated to the degree of complexity involved in formulating and delivering your financial plan, and we may therefore have an incentive to add additional complexity with respect to your financial plan.

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.

More detailed information about our fees and costs may be found in [Item 5 of our Form ADV Part 2A brochure](#).

#### **Conversation Starter**

- "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?***

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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 custodian(s) we recommend provide(s) us various products and services that are intended to directly benefit you, us, or both of us. To the extent a custodian provides us products or services that don't directly benefit you, this creates an incentive to recommend that custodian. To learn how we address this incentive, please refer to [Item 12 of our ADV Part 2A brochure](#).

We also offer tax preparation and e-filing services to clients in addition to advisory services. These additional services are generally performed for an additional fee and therefore create a conflict of interest. To learn how we address this incentive, please refer to [Item 10 of our ADV Part 2A brochure](#).

We are under common control with Anthem Capital Management, LLC ("ACM"), the general partner of the Anthem Maverick Fund LP (the "Fund"). To the extent you elect to invest in the Fund, additional indirect compensation will be earned by David Borowsky in his capacity as a Managing Member of ACM. To learn how we address this incentive, please refer to [Item 10 of our ADV Part 2A brochure](#).

**Conversation  
Starter**

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

More detailed information about our conflicts of interest may be found in [our Form ADV Part 2A brochure](#).

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

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Our financial professionals are compensated based on the amount of client assets they service (for asset-based fees), or the time and complexity required to meet a client's needs (for fixed fees). They are not compensated based on the sale of a particular product and do not earn commissions.

***Do you or your financial professionals have a legal or disciplinary history?***

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

**Conversation  
Starter**

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

***Additional Information***

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You can find additional and up-to-date information about our investment advisory services and request a copy of the relationship summary by visiting <https://www.invariantinvestments.com>, emailing [seth@invariantinvestments.com](mailto:seth@invariantinvestments.com), or calling (717) 317-9006.

**Conversation  
Starter**

"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?"

***Exhibit A - Material Changes to Client Relationship Summary***

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This is an amendment to the most recent version of the Client Relationship Summary dated February 13, 2024. In this updated version, the conflicts of interest section was amended to disclose the relationship with ACM and the Fund.