

CLIENT RELATIONSHIP SUMMARY

(FORM CRS)

ITEM 1. INTRODUCTION:

Return Advisors Inc (“the Firm” therein) is registered as an investment adviser with the U.S. Securities and Exchange Commission (“SEC”) IA SEC # 801-119538. This form summarizes certain aspects of the nature of our investment advisory relationship with you. Brokerage and investment advisory services and fees differ, and that it is important for you to understand these differences.

Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing. As used in this Form, the words “the Firm”, “we,” “our,” and “us” refer to Return Advisors Inc, and the words “you,” “your,” and “client” refer to you as a client of the Firm.

ITEM 2. RELATIONSHIPS AND SERVICES:

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

The Firm provides customized investment management services to individuals, high net worth clients, trusts, estates, and small businesses:

- i. **MISSION:** The Firm’s mission is to provide all necessary services assisting clients in determining their financial objectives, define the suitability of risk-return profile, cash needs and managing their portfolio of securities in their brokerage accounts accordingly.
- ii. **SERVICES PROVIDED:** **The Firm is an independent investment adviser and is not a Broker Dealer,** nor does it have any fees arrangement, profit sharing or compensation of any nature, in cash or in kind, with any third party acting as or related to a Broker Dealer, Custodian, Bank, Tax and or an accounting specialist.
- iii. **MONITORING:** The Firm **monitors** client’s investments and any relevant information and news related to such investments on a continuous and worldwide basis whenever markets are opened.
- iv. **DISCRETIONARY AUTHORITY:** The Firm’s strategy planning and its execution is conducted on a **discretionary basis**, which means that the Firm does not require any kind of approval from the client every time it places and order on their brokerage accounts. Nonetheless, these orders must comply within the objectives of risks and return defined by the client in the Client-Advisor Agreement.
- v. **OFFERINGS:** **The Firm does not offer proprietary products neither does impose account minimum amounts nor any lock-in periods in relation to its advisory services.**
- vi. **TYPE OF INVESTMENTS:** Some of the investment instruments the firm advises its clients on include without limitation, mutual funds, exchange traded funds (“ETFs”), equities, bonds, treasuries, options and/or limited partnership interests. Additionally, some of the mutual funds, ETFs or limited partnership interests the Firm recommends to clients may invest in commodities and/or real estate.
- vii. **OWNERSHIP AND DOMICILE:** The Firm is domiciled and conducts its operations in Florida. Prospects and client business are primarily in New York. The firm was originally incorporated in New York as an “S-Corporation”. It is 100% owned by Roberto Estrugo, the Managing Member, Chief Compliance Officer, and sole owner of the firm.

CONVERSATION STARTERS:

- **GIVEN MY FINANCIAL SITUATION, SHOULD I CHOOSE AN INVESTMENT ADVISORY SERVICE? WHY OR WHY NOT?**
- **HOW WILL YOU CHOOSE WHICH INVESTMENTS TO RECOMMEND?**
- **WHAT IS YOUR RELEVANT EXPERIENCE, INCLUDING YOUR LICENSES, EDUCATION, AND OTHER QUALIFICATIONS? WHAT DO THESE QUALIFICATIONS MEAN?**

ITEM 3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

WHAT FEES WILL I HAVE TO PAY?

The Firm's fee schedule consists ONLY of an annual fee of the assets under management payable in arrears directly by the retail investors monthly.

You will pay additional fees and costs whether you make or lose money on your investments. which include fees charged by your custodian for account maintenance and may include transaction fees, commissions, or brokerage fees. You will also incur the costs associated with any ETFs or Mutual Funds, including management fees, fund expenses, and any applicable transaction-related fees and charges. 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.

CONVERSATION STARTERS:

- **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? WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. The Firm makes money only through the fees charged to retail investors.

You should understand and ask us about these potential conflicts because they can affect the investment advice, we provide to you. Here are some examples to help you understand what this means:

- PROPRIETARY PRODUCTS:** Are investments that are issued, sponsored, or managed by the Firm or its affiliates; **The Firm does not have such investments nor has any other affiliates other than Roberto Estrugo.**
- THIRD-PARTY PAYMENTS:** Are compensations the Firm receives from third parties when it recommends or sells certain investments; **The Firm does not have any compensation from third parties.**
- REVENUE SHARING:** Are revenues for which the manager or sponsor of those investments or another third party (such as an intermediary), shares with the Firm; **The Firm does not receive any such revenue from anybody else.**
- PRINCIPAL TRADING:** Are Investments the Firm buys from a retail investor, and/or investments the Firm sells to a retail investor, for or from its own accounts, respectively; **The Firm does not buy and or sell investments to or from our clients.**

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

The Firm compensates its Investment Professionals through an annual salary.

ITEM 4. DISCIPLINARY HISTORY:

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

NO. Please visit Investor.gov/CRS for an updated, free and simple search tool to research your financial professionals at any time.

CONVERSATION STARTERS

- **AS A FINANCIAL PROFESSIONAL, DO YOU HAVE ANY DISCIPLINARY HISTORY?**
- **FOR WHAT TYPE OF CONDUCT?**

ITEM 5. ADDITIONAL INFORMATION:

For additional information about our services, for additional information, please refer to the most updated version of both Form ADV Part 2A, Form ADV Part 2B, the Client-Advisory Agreement or if you have any further questions, please contact Roberto Estrugo at (917) 495-5376 or at roberto@addreturn.com.

CONVERSATION STARTERS • WHO IS MY PRIMARY CONTACT PERSON? Roberto Estrugo

- **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?**