

## Form CRS

### **Pave Investment Advisors, LLC (“Pave IA”) & Pave Securities, LLC (“PaveSec”)**

Pave Investment Advisors, LLC. (“Pave IA”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Pave Securities, LLC (“PaveSec”) is an introducing broker-dealer registered with the Securities and Exchange Commission (“SEC”) and Financial Industry Regulatory Authority (“FINRA”). Pave IA and PaveSec are; collectively referred to as “Pave”, “we”, “our”, “us”, or “our firms”. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. This document is intended to provide you with a high-level overview of our services, fees, costs, conflicts of interest, standard of conduct, disciplinary history, and the disciplinary history of Pave’s financial professionals.

Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS). The site also provides educational materials about broker-dealers, investment advisers and investing. Information in text boxes below are intended to be conversation starters for you to have with us and are required by the instructions to Form CRS.

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

Pave provides both brokerage services through PaveSec and investment advisory services through Pave IA.

PaveSec is an online broker that provides solicited investment recommendations to help you manage a diversified investment portfolio based on your specific risk tolerances, personal preferences and time horizon. PaveSec is an introducing broker that works with a clearing and custodial broker-dealer to clear, settle and custody your assets.

PaveSec does not ever take control of or hold your assets. PaveSec, through its phone application, offers you the ability to buy and sell investment products like stocks, exchange traded funds (“ETF”) or exchange traded notes (“ETN”) in a brokerage account. All trading at PaveSec is approved by you or Pave IA if you choose to hire PaveIA as your investment advisor. PaveSec employs registered representatives for the sole purpose of supporting you in the process of managing your investments with the Pave application and software. PaveSec sales representatives do not make any investment recommendations to retail investors.

PaveSec does not employ human “brokers” or “advisors” to manage your account. Pave’s software monitors your specific holdings and makes recommendations as to whether you should buy, sell or hold investment products and it is up to you if you choose to follow PaveSec’s recommendations. We provide investment tools and education to help you monitor the performance and composition of your account and make decisions as to the investments you choose to make. We do monitor your account for other purposes such as compliance and to ensure that your account does not present undue risk.

Pave IA provides investment advisory services to retail investors. These retail investors may be located in the United States of America or any other jurisdiction Pave IA is licensed or authorized to do business.

Pave IA manages discretionary portfolios using quantitative and algorithmic methods. We generally update the quantitative and algorithmic models in our application weekly, but recommend you review your portfolio monthly or quarterly.

Pave IA first determines your investment objective through a questionnaire on the application, and then makes discretionary investments according to your investment objectives. You may, at any time, impose certain restrictions on our discretionary portfolio management within the client questionnaire on Pave’s application. If you turn on “Autopilot” in the application, you are hiring Pave IA to act as your discretionary investment manager on your PaveSec account. Pave IA has no discretion in determining whether any restriction request is reasonable or appropriate and will manage your assets based on the settings and constraints you place in the application and software.

Even though you may be hiring Pave IA as the discretionary manager of your assets, it is recommended that you monitor your account. If you do not sign into the application and review your investments at least quarterly, we will send you reminder emails to review your portfolio.

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We generally recommend clients purchase individual securities among global equities but in rare cases, may also recommend ETFs , ETNs and cash. None of the investments we recommend are affiliated with us and we have no financial interest in the recommendations we make. There are generally no account minimums or other requirements to open or maintain a brokerage or investment advisory account with Pave.

For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively Pave IA's Form [ADV Part 2A](#).

*Conversation Starter: Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?*

*Conversation Starter: How will you choose investments to recommend to me?*

*Conversation Starter: What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

## ***What fees will I pay?***

### **Fees, Costs, Conflicts, and Standard of Conduct:**

As a PaveSec customer, the principal fees and costs you will incur for our brokerage services are: (i) Commissions; (ii) Exchange, Regulatory, and Clearing Fees; (iii) Account Service Fees;(v) Payments for third-party services; and (vi) Other Fees and Costs. Fees and costs will vary depending on the services you request.

As a Pave IA customer you may pay a monthly Advisory Fee based on your account balance.

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 the fees and costs you are paying.

- **Commissions:** Commissions are transaction-based fees charged by brokers. PaveSec has a tiered commission pricing plan. Commissions charged will vary depending on the volume of trading in a month by PaveSec and be passed through to you based on the share volume traded in your account. PaveSec's commission ranges from \$0.0155 per share to \$0.0185 per share, with a minimum ticket order of \$0.365.

- **Exchange, Regulatory, and Clearing Fees:** Exchanges, clearing houses and regulators may charge PaveSec fees. These fees may be charged to your account in addition to commissions and the products you trade.

- **Subscription Service Fees:** PaveSec has a monthly account fee based on the size of your account. If your account balance is less than \$10,000, the monthly fee is scaled based on the account size. If your account balance is \$10,000.00 or greater the monthly fee is \$10.00 per month. Pave IA has a monthly investment advisory fee based on your account size. If your account balance is less than \$10,000, the monthly fee is scaled based on the account size. If your account balance is \$10,000.00 or greater the monthly fee is \$10.00 per month. If you are using a third party broker and your account balance is less than \$10,000, the monthly fee is \$10.00. If the account balance is \$10,000 or greater the fee is \$20.00 per month if you use a third party broker dealer. If your account balance is \$10,000.00 or greater the monthly fee is \$10.00 per month. We may waive or discount some or all of the monthly fees from PaveSec or Pave IA in our sole discretion.

- **Other Fees and Costs:** PaveSec offers products and services in addition to online trading. Such products and services include, but are not limited to, processing corporate actions and dividends, cash movements, and securities transfers. These services are offered at additional cost from the clearing broker and these fees are passed through to you without any markup from PaveSec. In addition, if your assets are invested in ETFs, you will bear your pro rata share of the investment management fees and other fees of those funds, which would be in addition to the fees you pay us.

While the above list includes some of the more common fees and costs that you may encounter, it is not exhaustive. For complete details of services provided by PaveSec and corresponding fees and costs, please contact [support@pavefinance.com](mailto:support@pavefinance.com)

For more detailed information about Pave IA's fees and costs related to Pave IA's management of your account, please See Item 5 in Pave IA's Form [ADV Part 2A](#).

A copy of Pave IA's Part 2A is available at:

<https://files.adviserinfo.sec.gov/IAPD/Content/Common>

*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 broker and/or investment adviser? How else does your firm make money and what conflicts of interest do you have?***

When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you. Here are some examples to help you understand what this means.

- **Third-Party Payments:** For certain assets in your account (for example, cash balances), we receive compensation from third-parties when this cash gets moved into an overnight sweep to generate interest.

We may recommend, on a discretionary basis, to you that you purchase a certain set of securities based on securities you hold, cash available to invest, and your risk tolerance. Other clients with other investment objectives, risk tolerances, current holdings and cash available could receive different discretionary advice. We mitigate this conflict of interest by using a proprietary, quantitative investment model and conduct software reviews to ensure the model is making appropriate recommendations.

We are affiliated with Systematic Alpha Investments, LLC (“SAI”). SAI uses the same or similar algorithmic trading models that were developed by the portfolio manager. The affiliated company has a different type of client base, and provides advice on a discretionary basis, which means that we use the models differently in the affiliated adviser than how we use the models for you. You can see SAI’s ADV Part 2.A. Form [ADV Part 2A](#).

*Conversation Starter: How might your conflicts of interest affect me, and how will you address them?*

For more detailed information about our conflicts of interest, please review Item 5 of Pave IA’s Form [ADV Part 2A](#).

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

Our financial professionals receive a salary and stand to receive the profits of the firm. Pave staff are not compensated based on commissions or fees, performance of your accounts, the amount of your assets they service, the products that you buy or sell, or revenue earned from services chosen by you.

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

No.

We encourage you to visit [www.investor.gov/CRS](http://www.investor.gov/CRS) to research our firm and [www.brokercheck.finra.org](http://www.brokercheck.finra.org) to research our financial professionals.

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

## ***Additional Information***

Additional information about our firm is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may get a copy of Pave IA’s Form [ADV Part 2A](#) or our *relationship summary* at [support@pavefinance.com](mailto:support@pavefinance.com) or calling 646-690-2800.

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

A copy of Pave IA’s Part 2A is available at:

<https://files.adviserinfo.sec.gov/IAPD/Content/Common>