

FORM ADV, PART 2A  
THE BROCHURE  
OF

**EAST END ADVISORS, LLC**

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March 28, 2024

This Brochure provides information about the qualifications and business practices of East End Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at 212-218-8137. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about East End Advisors, LLC also is available on the Securities and Exchange Commission's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

East End Advisors, LLC ("East End" or "Advisor") is an investment advisor registered with the Securities and Exchange Commission; this registration does not imply that the Advisor or any of its employees has any particular level of skill or training.

In accordance with the rules of the SEC, we use this Brochure as our disclosure document for prospective clients as well as current clients. We deliver the Brochure to prospective clients no later than at the time when the advisory contract is entered into.

Each year we send our current clients the annually-updated Brochure, or a separate summary of material changes together with information on how to obtain the complete Brochure and how to obtain information about us through the SEC website.

In addition, we will send our clients any interim updates of the Brochure to the extent the SEC's rules require or if we believe it is appropriate.

## **Item 2**

### **MATERIAL CHANGES**

The Advisor does not believe that there are any material differences between this Brochure and the Advisor's last annual update of the Brochure dated March 30, 2023.

### Item 3

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**PLEASE NOTE: THIS BROCHURE MOSTLY REFERS TO THE ADVISOR'S "EMPLOYEES"  
RATHER THAN THE LEGAL TERMS CONTAINED IN THE INSTRUCTIONS FOR THE  
BROCHURE BECAUSE, IN OUR CASE, "EMPLOYEES" COVER ALL OF  
THE REQUIRED PERSONS.**

#### Item 4

### ADVISORY BUSINESS

#### A. The Advisor

East End was formed in April 2008 as a New York limited liability company. The principal owners of the firm are Brian R. Clifford, Peter A. Nadosy and David R. Salomon.

##### Brian R. Clifford - Managing Partner

Bowdoin College (AB) 1993 (German)/Wharton (MBA) 2001

Principal - East End Advisors, LLC (Oct. 2010 to Present)

Partner and Head of Research - Berens Capital Management, LLC (2001 - 2010)

##### Peter A. Nadosy - Managing Partner

Brooks School 1964/Harvard College (AB) 1968/Columbia University (MBA) 1970

Principal - East End Advisors, LLC (2008 to Present)

Advisory Director - Morgan Stanley (1998-2008)

Vice Chairman - Morgan Stanley (1996-1998)

President - Morgan Stanley Asset Management (1985-1996)

##### David R. Salomon - Managing Partner

Pomfret School 1986/Brown University (BA) 1990

Principal - East End Advisors, LLC (2008 to Present)

Managing Director - Grisanti Brown & Partners LLC (2003-2008)

Millsport LLC (1997-2003)

Mr. Richard E. Salomon served as a managing partner of East End through the end of 2019. Since January 1, 2020, Mr. Richard E. Salomon has provided assistance to East End in regard to its general business activities and long-term strategic planning pursuant to a consulting agreement between East End and RES/Mecox Consulting LLC, a single-member LLC that is owned by Mr. Richard E. Salomon and has no other consulting clients other than East End.

##### Richard E. Salomon – Consultant

Choate School 1960/Yale University (BA)/1964 Columbia University (MBA) 1967

Principal - East End Advisors, LLC (2008 to Present)

President - Mecox Ventures, Inc. (2000-2008)

President and Managing Director - Spears, Benzak, Salomon & Farrell (1982-2000)

#### Item 4

### **ADVISORY BUSINESS (continued)**

- B. Types of Advisory Services &
- C. Client-Specific Services

East End assists clients in developing a customized, overall asset allocation strategy across all asset classes and in setting investment goals and objectives. Then, as a manager-of-managers, we provide advice regarding which external, third-party, unaffiliated investment managers ("Investment Managers") would be most appropriate to manage portions of each client's assets to achieve their objectives. Generally, East End will recommend Investment Managers that manage investment funds including investment partnerships, private equity funds, separately managed accounts, hedge funds and the like ("Investment Funds"). Accordingly, we assist each of our clients with building broadly diversified investment portfolios.

We monitor the Investment Managers and their Investment Funds and use benchmarks and other quantitative data as well as qualitative information to measure the relative performance of the Investment Funds on behalf of clients. As part of this process, and as we deem appropriate from time to time, we also consider potential changes to our clients' rosters of Investment Funds and Investment Managers.

As such, since the majority of our clients' assets are invested in Investment Funds managed by third-party Investment Managers, East End provides primarily non-discretionary advisory services.

To the extent a portion of a client's short-term assets are pending deployment in an Investment Fund, or to the extent a client has determined to maintain a permanent portion of their portfolio outside of Investment Funds, East End provides advisory services on a discretionary basis. We typically achieve this through investments in U.S. Government securities, although we may, to a significantly lesser extent, use other investments from time to time at the client's request or as we deem appropriate.

For our purposes, our clients' portfolios ("Portfolios") consist of their roster of Investment Funds, their assets awaiting deployment and their assets not destined for Investment Funds.

East End also provides general investment consultation to clients without supervisory services for a fixed, flat, annual fee.

**Item 4**

**ADVISORY BUSINESS (continued)**

D. Wrap-Fee Program Participation

This item is not applicable because East End does not participate in any wrap fee programs.

E. Client Assets Under Management

East End managed approximately \$5.3 billion in client assets on a non-discretionary basis and approximately \$1.2 billion in client assets on a discretionary basis, as of December 31, 2023.

## **Item 5**

### **FEES AND COMPENSATION**

#### **A. Advisory Fee**

All of East End's clients are "qualified purchasers" (as defined in the Investment Company Act of 1940). For advisory services, East End charges an annualized fee based on the amount of Portfolio assets it manages and monitors for the particular client. Such fee is typically paid quarterly. Our fee is based solely on the amount of assets under management and East End does not charge performance-based fees. For investment consultations without investment supervisory services East End charges a flat fee for such services.

All fees and payment terms are negotiated individually with each client depending on the full nature of services provided to such client and are subject to revision.

#### **B. Frequency and Method of Advisory Fee Payment**

We bill our clients for the fee for our investment advisory and investment consultation services, which is generally payable in quarterly installments.

#### **C. Other Fees or Expenses**

In addition to paying East End's advisory fees, our clients pay their own custodian fees. East End clients also incur the cost of management fees, performance fees and operating expenses related to their Investment Funds.

#### **D. Timing of Advisory Fee Payments**

East End's fees are generally charged in advance. If an account is terminated, the client is entitled to a pro rata refund of any amounts paid but not yet earned by East End.

#### **E. Compensation for the Sale of Investment Products**

This is not applicable, since neither the Advisor nor any of its employees accepts compensation for the sale of securities or other investment products.

**Item 6**

**PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

This item is not applicable because East End does not charge any performance-based fees to any clients.



**Item 7**

**TYPES OF CLIENTS**

East End provides investment advisory services to various high net worth individuals, families, trusts and charitable institutions, foundations and endowments.

Generally, the minimum Portfolio size for an East End client is \$500 million. However, we have accepted clients with less than that amount.

## Item 8

### **METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

#### A. Methods of Analysis and Investment Strategies

Our primary advisory service involves setting investment goals and objectives together with a client, and then formulating a customized asset allocation strategy including advice regarding specific Investment Managers and Investment Funds, and assistance in building a broadly diversified investment portfolio. We provide advice regarding change recommendations as necessary.

The majority of East End's investment recommendations are long-term in nature and thus require long-term investments with Investment Managers or in Investment Funds. We also use other investment strategies, which could be long-term or short-term, as part of a client's overall asset allocation strategy or on the portion of a client's Portfolio that is pending deployment in an Investment Fund or that is designated by the client to be kept outside of Investment Funds. These other investments primarily consist of investments in U.S. government securities.

The Advisor performs on-going reviews of Investment Managers, which includes reviews of various factors such as performance, quantitative measures, qualitative matters and periodic meetings with and reports from Investment Managers. In addition, East End's sources of information for our investment ideas may originate through the membership of our managing partners on external boards, investment committees or the like, or may come from financial publications and research materials prepared by others. East End's employees have also served, and may continue to serve, on limited partner advisory committees or similar committees of certain Investment Funds in which clients invest. These are committees formed by certain Investment Managers, generally composed of fund investors or their representatives, to provide fund investors a voice in and visibility into certain Investment Fund matters.

We also use various proprietary tools to assist in the analysis of specific Investment Funds and the client's overall Portfolio. Additionally, East End uses Advent Axys Portfolio software as the primary accounting/performance reporting system for client Portfolios and for pricing and index information.

*Clients should remember that investing in securities involves the risk of loss, which they should be prepared to bear.*

**Item 8**

**METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND  
RISK OF LOSS (continued)**

B. General Material Risks &

C. Security-Specific Material Risks

East End's predominant investment strategy is the development of an asset allocation strategy and the subsequent recommendation of Investment Funds to clients. The material risks involved in this strategy are general market risks and risks specific to such funds, including:

- Market Risk – The value of a client account will vary continuously as a result of a variety of factors including macro-economic issues, global geo-political issues and as a result of turbulence and volatility in the financial markets in general.
- Lack of Transparency – Certain types of Investment Funds often have fewer disclosure requirements as to their portfolio, strategies and/or risks.
- Conflict of Interest – Most of the Investment Funds East End recommends to clients pay performance-based fees to their respective managers. By receiving a performance fee, the manager of an Investment Fund has an incentive to construct a riskier portfolio if it wants to increase the chances of a higher return and therefore higher performance fees.
- Riskier Strategies – Investment Funds invest in securities. Certain Investment Funds may use strategies that involve higher risk and volatility, such as leverage, short-selling and/or trading on margin. Others may make investments in riskier securities such as high yield bonds, distressed securities or collateralized debt obligations. In addition, private equity funds invest directly in businesses, ranging from young or emerging companies to existing mature companies that require additional capital.

**Item 9**

**DISCIPLINARY INFORMATION**

This item is not applicable because there are no legal or disciplinary events relating to the Advisor or its employees.

**Item 10**

**OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

This item is not applicable to the Advisor because neither it nor, to the extent the category applies, any of its employees: (1) is registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer; (2) is registered or has an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of these entities; (3) has a relationship or arrangement with certain specified entities or companies that is material to our advisory business or our clients and that might cause a material conflict of interest with clients; or (4) receives any compensation directly or indirectly from the investment advisors that we recommend for our clients that creates a material conflict of interest, or have any other business relationships with the investment advisors that we recommend for our clients that create a material conflict of interest.

## **Item 11**

### **CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

#### **A. Code of Ethics**

East End's Code of Ethics provides that, generally, our employees may purchase and sell securities for their personal accounts and for the accounts of certain related persons (primarily consisting of immediate family members and certain related entities). Our Code of Ethics is designed to ensure that employees act with honesty, integrity and professionalism and adhere to federal securities laws and regulations.

Employees must obtain prior written approval from the Chief Compliance Officer before investing in initial public offerings or limited offerings (private placements including investments in Investment Funds); the Chief Compliance Officer must obtain this approval from the Chief Executive Officer.

Employees are also required to submit reports detailing the personal securities holdings of themselves and their related persons to the Chief Compliance Officer when they are hired and on an annual basis, and they must report on a quarterly basis about the personal securities trades that they and their related persons have made in the prior quarter.

Our employees must give prior notice of, and under certain circumstances receive approval for, any outside activity in which they wish to engage. This includes outside business interests, private securities transactions, and maintenance of personal brokerage accounts.

As a general rule, East End employees may only accept gifts of strictly nominal value including normal and customary business entertainment (such as business meals and entertainment where the person providing the entertainment is present) that is not "lavish," the cost of which would be paid by East End as a reasonable expense if not paid by someone else.

**Item 11**

**CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT  
TRANSACTIONS AND PERSONAL TRADING (continued)**

Our Code of Ethics also contains policies designed to prevent insider trading by employees and their related persons for their own account or the account of any East End client. We take our obligation to detect and prevent insider trading with the utmost seriousness. We may impose penalties for breaches of the insider trading rules (and any of our other policies and procedures contained in our compliance manual), even in the absence of any indication of insider trading. Depending on the nature of the breach, penalties may include a letter of censure, profit “give-ups,” fines, referrals to regulatory and self-regulatory bodies and dismissal.

We will provide a copy of our Code of Ethics to any client or prospective client, upon request. Please contact Mr. Christopher J. Brown at 212-218-8137.

**B. Client Trades in Securities in which there is a Material Personal Financial Interest**

As a matter of practice and as a general rule, neither the Advisor nor any of its employees recommends to clients, or buys or sells for client accounts, any securities in which the Advisor or any employee has a financial interest. However, certain employees of the Advisor currently hold an interest which represents a de minimis percentage of the equity of an unaffiliated Investment Manager that manages an Investment Fund that the Advisor has recommended to certain clients. This represents a conflict of interest because fees paid to the Investment Manager in respect of client investments in the Investment Fund indirectly benefit the employees who hold an interest in the Investment Manager. The Advisor addressed this conflict by providing each client to whom the investment was recommended with full disclosure of the fact that employees held an interest in the Investment Manager and of the resulting conflict and proceeding with each client’s investment only where such client affirmatively chose to invest after being informed of the conflict. The Advisor intends to take the same approach in the unlikely event that any similar conflict should arise in the future.

**Item 11**

**CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT  
TRANSACTIONS AND PERSONAL TRADING (continued)**

- C. Personal Investments in the Same Securities that are Bought or Sold for Clients
- D. East End employees may invest in Investment Funds recommended to clients at, or at about, the same time as clients. In some cases, this practice enables employees to make investments that would not otherwise be available to them because of, for example, minimum investment thresholds. Although this practice would pose a conflict in cases where employees' investment interests differed from those of clients, the Advisor believes that the interests of its employees and clients are nearly universally aligned where they invest concurrently in the same Investment Fund. The Advisor addresses this potential conflict by seeking to align clients' and employees' interests to the extent possible by requiring that any employees invest on the same terms as clients that are concurrently investing and without, for example, any discount on Investment Fund management fees or any other terms or advantages not also afforded to such clients.

Although the Advisor believes employee investment in Investment Funds recommended to clients generally aligns the incentives of the Advisor's employees with those of the Advisor's clients as described above, this practice also may present a conflict of interest in that the employee or his or her related person could take an investment opportunity away from a client if the investment opportunity is, or becomes, limited. The Advisor addresses this conflict by requiring employees and their related persons to obtain prior approval for investments in Investment Funds and by prohibiting employees from making an investment in any case where there is not sufficient availability to first satisfy the full allocation considered by the Advisor to be appropriate for clients based on the considerations described below.

East End makes decisions to recommend, purchase, sell or hold investments for its client accounts based on the specific investment objectives, guidelines, restrictions, risk tolerances, asset allocation goals and circumstances of each client account. East End allocates investment opportunities to each client over time on a fair and equitable basis relative to its other clients. Where client accounts have competing interests in limited investment opportunities, East End will allocate these investment opportunities based on numerous



considerations, including cash availability and/or liquidity requirements, the time competing accounts have had funds available for investment or have had investments available for sale, an account's participation in other or comparable opportunities, tax considerations, the relative size of portfolio holdings of the same or comparable investments, etc. In general, East End favors clients holding meaningful investment weightings for their accounts. For example, East End believes that it is generally more desirable for a smaller client to hold a meaningful position in a particular investment, rather than for a larger client to hold an insignificant position.

- E. On certain occasions, East End may recommend that a client buy or sell a security that is publicly traded. East End does not generally select or recommend broker-dealers for such transactions. East End's client will either use a broker-dealer they select to execute transactions in the security, or direct East End to use a specific broker-dealer. Whichever is the case, the client will negotiate terms and arrangements for the account with that broker-dealer, and East End will not seek better execution services or prices from other broker-dealers.

**Item 12**

**BROKERAGE PRACTICES**

This Item is not applicable because the Advisor does not select or recommend broker-dealers for client transactions.

**Item 13**

**REVIEW OF ACCOUNTS**

East End's Managing Partners, along with East End's team of investment professionals, review client Portfolios on a weekly basis. We may also review Portfolios more frequently because of a client's investment strategy or objective, a client's personal needs, the macro-economic environment, changes in laws, the availability of new investment products and superior or inferior performance by a previously recommended or available Investment Manager or Investment Fund. We limit the number of clients we manage to ensure proper oversight and the performance of regular and thorough reviews of client Portfolios.

East End generally provides clients with written Portfolio summary reports and performance reports monthly. Performance is reported in absolute and relative terms. That is, the underlying Investment Funds in client Portfolios are compared to the performance of agreed-upon indices and/or other Investment Managers with a similar style and strategy.

**Item 14**

**CLIENT REFERRALS AND OTHER COMPENSATION**

This item is not applicable because the Advisor does not receive an economic benefit from anyone other than a client for providing investment advice to our clients, nor does the firm directly or indirectly compensate anyone for client referrals.

**Item 15**  
**CUSTODY**

East End has engaged Grant Thornton LLP to conduct annual surprise examinations of client accounts for which EEA maintains custody, in accordance with SEC requirements. Following an examination, Grant Thornton LLP files a Form ADV-E with the SEC as part of East End's filing with the SEC. Additional information can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

East End's clients should receive, at least quarterly, statements from the broker-dealer, bank or other qualified custodian that holds and maintains their investment assets. East End urges clients to review carefully such statements and compare such official custodial records to any statements that East End may provide to them. East End's statements may vary from the custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.

**Item 16**

**INVESTMENT DISCRETION**

The Advisor provides primarily non-discretionary advisory services. To the limited extent we have discretionary authority over client accounts, a client's objectives and guidelines may limit that authority. Before we assume any discretionary authority over a client's account, we ensure that there is proper authorization in place.

**Item 17**

**VOTING CLIENT SECURITIES**

This item is not applicable because we do not accept authority to vote any client securities.

**Item 18**

**FINANCIAL INFORMATION**

A. Balance Sheet

This item is not applicable because the Advisor does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

B. Financial Condition

The Advisor has no financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

C. Bankruptcy

This item is not applicable because the Advisor has never been the subject of a bankruptcy petition.