

**Item 1 Cover Page**

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**This brochure provides information about the qualifications and business practices of Complete Advisors. If you have any questions about the contents of this brochure, please contact us at (516) 240-6161. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Complete Advisors also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Material Changes**

There have been no material changes to this brochure since the date of the last annual updating amendment noted below.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was March 24, 2023.

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#### **Item 4 Advisory Business**

Complete Advisors is a new investment advisor firm formed in 2019 and is registered with the U.S. Securities and Exchange Commission since March 2020. The principal owners of the firm are Evan M. Levine, Co-Owner and Chief Compliance Officer, and Nainesh A. Shah, Co-Owner.

##### Advisory Services

Complete Advisors' ("Advisor") principal service is providing fee-based investment advisory services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client's objectives. The advisor's primary approach is to design portfolios that provide investors with sufficient confidence in reaching their stated goals. A strategic, not tactical, approach is employed. Generally, changes are made to the portfolio if an investment vehicle is discovered that better represents a broad asset class - or offers the same representation at a lower cost. Changes also may occur if an investors overall financial situation and/or goals & objectives change. Rebalancing occurs when there is significant drift from the original allocation targets. Changes are rarely based on anticipating the short-term direction of the markets or economy. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance. The Advisor may use exchange listed securities, over-the-counter securities, foreign securities, warrants, corporate debt securities, CDs, variable life insurance, variable annuities, municipal securities, mutual funds, United States government securities, and options on securities to accomplish this objective. Advisor measures and selects mutual funds, ETF's and separate accounts based on tracking error relative to the index and expenses.

##### Qualified Retirement Plan Consulting Services

Complete Advisors provides services to qualified retirement plans either as a 3(21) limited scope fiduciary or 3(38) full scope fiduciary, including employee communication and education programs, and the investment selection and monitoring process, including its investment policy statement, hereinafter referred to as the "IPS". With regard to the IPS, the Advisor will assist the Plan Sponsor in adopting a suitable IPS, amending it from time to time, and will provide information and recommendations, consistent with the IPS, to aid the Plan Sponsor in selecting and monitoring investments offered to Participants in the Plan.

The Advisor's roles and actions in fulfilling all responsibilities pertaining to qualified plan services shall not include those of the Plan's Trustee, and will be performed solely at the direction of the Plan Sponsor, its authorized officers, employees and/or agents. At no time will the Advisor accept, maintain possession of, or have custodial responsibility for, the Plan's assets. The Advisor will not conduct or effect the purchase or sale of any assets of the Plan on behalf of the Plan Sponsor or Plan Participants. As part of its services to the Plan, the Advisor will provide investment education to Plan Participants, but will not provide specific investment advice to any Participant, person or entity related to the Plan other than the Plan Sponsor, except where the Participant, person or entity is separately an advisory client of the Advisor. Communicational and educational activities in which the Advisor engages related to Participants in the Plan shall be solely at the direction of the Plan Sponsor, and shall not be represented by the

Advisor or Plan Sponsor as investment, tax or legal advice. The Advisor is not licensed to provide, shall not provide, nor be construed to provide, the services of an attorney or accountant.

#### Selection of Other Advisors

Complete Advisors may recommend and refer clients to unaffiliated strategists and money managers or investment advisors through Managed Account programs sponsored by a third-party provider. In these arrangements, the Client will then enter into a program and investment advisory agreement with the program sponsor and sub-advisors. Complete Advisors will assist and advise the Client in establishing investment objectives for the sub-advisors and continue to provide oversight of the Client account and ongoing monitoring of the activities of the sub-advisors. The sub-advisors will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the program sponsor will charge a program fee that includes the investment advisory fee of the sub-advisors, the administration of the program and trading, clearance and settlement costs. The program sponsor will add Complete Advisors' investment advisory fee (described below in the answer to Item 5) and will deduct the overall fee from the Client account quarterly in advance based on the fair market value at the end of the preceding quarter.

The Client, prior to entering into an agreement with a Managed Account program sponsored by a third-party provider, will be provided with the program sponsor's Brochure that makes the appropriate disclosures. In addition, Complete Advisors and its Client will agree in writing that the selected program sponsor will manage the Client's account on a discretionary basis.

#### Financial Planning

Complete Advisors provides Financial Planning services. The Advisor's Financial Planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial planning services will also include: Preparation of family balance sheet and income statement, Monte Carlo style analysis, Overall asset allocation assessment, Insurance and estate planning review as well as Social security and Medicare consulting with 3<sup>rd</sup> party specialists.

#### Business Consulting Services

The Advisor also provides non-investment related business consulting services to small businesses on topics including business valuations, strategy, and operational effectiveness.

Complete Advisors will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

Complete Advisors does not provide portfolio management services to wrap fee programs.

As of December 31, 2023, Complete Advisors had \$54,527,000 in discretionary and \$20,954,000 in non-discretionary client assets under management.

## **Item 5 Fees and Compensation**

### Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay Complete Advisors a Management Fee, payable in quarterly advance, based on the amount of the assets to be managed by the Advisor as of the opening of business on the first business day of each quarter. The management fee will be in the range of .35% to .95% per annum.

These fees may be negotiated by Complete Advisors at its sole discretion. The custodian will directly deduct investment Advisory fees from the client account on a quarterly basis, and the custodian will send a quarterly statement to the client.

### Fixed Fee

Complete Advisors will charge a fixed fee for comprehensive financial planning services of \$5,000 per plan as contracted with client. Fixed fees may be negotiated in advance based at the discretion of the Advisor. Fixed fee-based clients are billed \$2,500 upon signing of the agreement, and the remainder on delivery of the plan. All plans will be completed within six months of the agreement date.

Business consulting services clients are charged a fixed fee. The Advisor will calculate the fixed fee for these services by multiplying an hourly rate of \$500 by the estimated hours needed to deliver the contracted services. The fixed fee will be billed one-half on project initiation with the remaining half due on completion of the project. All projects will be completed within six months of initiation.

All fees paid to Complete Advisors for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees and expenses will generally include management fees of the funds' investment manager and other fund expenses. A client could invest in these products directly, without the services of Complete Advisors. In that case, the client would not receive the services provided by Complete Advisors which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by Complete Advisors to fully understand the total fees to be paid.

Complete Advisors will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will Complete Advisors accept or maintain custody of a client's funds or securities. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.

Clients may request to terminate their advisory contract with Complete Advisors, in whole or in part, by providing advance written notice. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

Complete Advisors' management fee and fixed fee are payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client.

Neither Complete Advisors nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

#### **Item 6 Performance-Based Fees and Side-by-Side Management**

Complete Advisors does not charge performance-based fees.

#### **Item 7 Types of Clients**

Complete Advisors will offer its services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

Complete Advisors' cumulative minimum account requirement for opening and maintaining an account is \$500,000. However, Complete Advisors may accept accounts with a lower value at its sole discretion.

#### **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

Complete Advisors utilizes unaffiliated money managers or investment advisors through Managed Account programs. Those money managers or investment advisors will create and design the Client's portfolio based upon each client's investment objectives and will utilize their own analysis and methodology in that portfolio design.

The investment strategy the Advisor will implement includes long term purchases of securities held at least for one year.

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks.

Every saving and investment product have different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be.

While Complete Advisors can provide investment advisory services on any type of investment securities, it primarily recommends investments in the equity securities of companies (stocks), whether exchange traded or non-exchange traded. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative affects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

#### Risks of Investing in Stocks:

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#### Business Risk

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

#### Volatility Risk

Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. Market fluctuations can be unnerving to some investors. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

### Liquidity Risk

This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products.

## **Item 9 Disciplinary Information**

Neither Complete Advisors nor its management persons have had any legal or disciplinary events, currently or in the past.

## **Item 10 Other Financial Industry Activities and Affiliations**

Neither Complete Advisors nor its management persons are registered either as a broker-dealer or registered representatives of a broker-dealer.

Neither Complete Advisors nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Complete Advisors does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund" and offshore fund, other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Evan M. Levine, Co-Owner and investment advisor representative for Complete Advisors is also licensed and registered as an insurance agent for various insurance companies and spends less than 10% of his time on insurance related business. Therefore, he will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. This creates a conflict of interest. A conflict of interest exists because of the receipt of additional compensation by Mr. Levine. Clients are not obligated to use him or Complete Advisors for insurance products services. However, in such instances, there is no advisory fee associated with these insurance products.

Complete Advisors does recommend or select other investment advisors for clients. For more specific detail see the response to Item 4 above.

## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Complete Advisors is registered as an investment advisor with the SEC and maintains a Code of Ethics pursuant to SEC Rule 204A-1 that sets forth the basic policies of ethical conduct for all

managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Complete Advisors deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Complete Advisors are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Complete Advisors collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Complete Advisors will provide a copy to any client or prospective client upon request.

Complete Advisors and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of Complete Advisors can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, Complete Advisors has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Complete Advisors deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Complete Advisors are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates. Complete Advisors collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed quarterly by the Chief Compliance Officer to identify and resolve potential conflicts of interest. Complete Advisors' Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client's interest before those of the firm and themselves.

Complete Advisors requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment Advisor Representatives of Complete Advisors may trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, Complete Advisors' policy is to require the trading of all relevant client account prior to the trading of their own accounts. The Chief Compliance Officer examines personal trading activities of Complete Advisors' personnel to verify compliance with this policy.

## **Item 12 Brokerage Practices**

If requested by the client, Complete Advisors may suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. Complete Advisors will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion.

Complete Advisors does not receive research or other products or services other than execution from a broker-dealer or third party as a result of client securities transactions.

Complete Advisors does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

Complete Advisors recommends that all clients use a particular broker-dealer for execution and/or custodial services. The broker-dealer is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to Complete Advisors to direct all transactions through that broker-dealer in the investment advisory agreement.

As an investment advisory firm, Complete Advisors has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Complete Advisors' primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Complete Advisors may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

Complete Advisors will allow clients to direct brokerage at the firm's sole discretion. Clients should be aware that if they direct Complete Advisors to a particular broker-dealer for execution Complete Advisors may be unable to achieve most favorable execution of client transactions. Directing brokerage may cost clients more money than if Complete Advisors were to execute transactions at the broker-dealer where it has an established relationship. The client may pay higher brokerage commissions because Complete Advisors may not be able to aggregate orders to reduce transaction costs or the client may receive less favorable prices.

Complete Advisors utilizes the model programs of other unaffiliated money managers therefore there is no ability to aggregate trades. All client accounts are charged the same price per transaction.

### **Item 13 Review of Accounts**

Investment advisory client accounts are monitored on an ongoing basis. Financial Plans, once prepared and delivered to the client are not reviewed again unless the client requests a financial plan be updated. Client accounts (and/or financial plans) are reviewed by Evan M. Levine, Co-Owner and Nainesh A. Shah, Co-Owner. The nature of the review is to determine if the client account is still in line with the client's stated objectives.

The client will receive written statements no less than quarterly from the trustee or custodian. In addition, the client will receive other supporting reports from Mutual Funds, Asset Managers, Trust Companies or Custodians, Insurance Companies, Broker/Dealers and others who are involved with client accounts.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

Asset Allocation Accounts are re-balanced and re-optimized when deemed necessary by the Advisor or by third-party money manager for those participating in the Asset Management Program. Re-balancing is accomplished by reallocating assets to original asset targets and re-optimizing involves setting new target asset category percentages.

#### **Item 14 Client Referrals and Other Compensation**

Complete Advisors is not compensated by anyone for providing investment advice or other advisory services except as disclosed in Item 10 of this Brochure.

Complete Advisors does not directly or indirectly compensate any person who is not a supervised person for client referrals.

#### **Item 15 Custody**

Complete Advisors does not have custody of client funds or securities, except for the withdrawal of advisory fees directly from client accounts (please see Item 5 which describes the safeguards around direct fee deduction). However, as noted in Item 13 above, clients will receive statements not less than quarterly from the qualified custodian, and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

#### **Item 16 Investment Discretion**

Complete Advisors generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales are subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Complete Advisors.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Complete Advisors will be in accordance with each client's investment objectives and goals.

#### **Item 17 Voting Client Securities**

Complete Advisors will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these

proxies. Also, Complete Advisors cannot give any advice or take any action with respect to the voting of these proxies. The client and Complete Advisors agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

### **Item 18 Financial Information**

Complete Advisors does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and is not required to file a balance sheet.

Complete Advisors has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Complete Advisors does become aware of any such financial condition, this brochure will be updated and clients will be notified.

Complete Advisors has never been the subject of a bankruptcy petition.