

Stackwell Capital Advisers, LLC

Client Relationship Summary

April 1, 2024

Stackwell Capital Advisers, LLC (“Stackwell,” “We,” or “Us”) provides automated discretionary investment advisory services to you via the Stackwell investment program (the “Program”). We also provide impersonal Financial Counseling Services. Stackwell is registered with the United States Securities and Exchange Commission (“SEC”) as an investment adviser and provides all investment advisory services exclusively through virtual interaction conducted over the Internet. Brokerage and investment advisory services and fees differ, and it is important for you to understand these 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?

Stackwell offers automated discretionary investment advisory services to retail investors (“you”) via the Program. Based on the information you provide to Stackwell, we provide you with automated investment advice in the form of discretionary managed accounts utilizing one of the Firm’s three model portfolios. Stackwell also provides you impersonal Financial Counseling Services. Each of the discretionary managed models consists of publicly traded exchange traded funds (“ETFs”). The three models are designed to represent an Aggressive, Moderate and Balanced investing approach. The model recommendation is based solely on your provided responses to the suitability questionnaire. Although Stackwell recommends the model portfolio the algorithm believes is best suited for you based on suitability questionnaire responses, you may opt to invest in a more conservative model than recommended if you choose to do so. You may not opt to invest in a more aggressive model. The Program is an automated, web-based algorithmic system designed to help Clients invest regularly, diversify and think long-term. Our portfolios consist of only equity and fixed income ETF’s. Our firm reviews the curated portfolios at least annually to ensure that they are in line with the parameters of the models. Stackwell requires a \$10 minimum investment.

Apex will act as the clearing broker and qualified custodian for your Account. An account will be automatically rebalanced by Apex when withdrawals or deposits are made into the account. Apex will also provide a daily rebalancing recommendation to Stackwell if the holdings deviate from the model’s target asset allocation. Stackwell also rebalances with each trade in Client Accounts. In this way, Stackwell seeks to maintain the client’s target asset allocation through market fluctuation, withdrawals, deposits, and other events that may cause deviations while seeking to minimize the transaction costs of frequent portfolio rebalancing. In addition, when Clients make changes to their risk profiles Stackwell’s algorithm may generate a new risk score, which may result in the Client receiving a different model portfolio recommendation.

FOR ADDITIONAL INFORMATION REGARDING OUR SERVICES, PLEASE SEE OUR FIRM’S FORM ADV, PART 2A, WHICH IS AVAILABLE AT OUR WEBSITE AND ON THE SEC’S IAPD DATABASE AT WWW.ADVISERINFO.SEC.GOV.

Conversation Starter:

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?

You pay Us a “per-account” fee of \$1 per month per account, regardless of the account’s value. You will pay fees and costs whether you make or lose money on your investments. Apex may also charge you a fee for their brokerage and custodial services. Brokerage and investment advisory services and fees differ, and it is

important for you to understand these differences. 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 YOUR ADVISORY FEES AND COSTS CAN BE FOUND IN THE FIRM'S SERVICES DISCLOSURE AND FORM ADV, PART 2A BROCHURE (ITEM 5) THAT MAY BE OBTAINED BY CALLING (833) 312-3824.

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?

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:

Stackwell may receive a portion of interest revenue earned in the Cash Sweep Program under its clearing agreement with Apex. This economic benefit may give Stackwell a financial incentive to have clients participate in the Cash Sweep Program and to maintain cash balances in the Cash Sweep Program. This creates a conflict of interest.

MORE DETAILED INFORMATION ABOUT THE CONFLICTS OF INTEREST CAN BE FOUND IN THE FIRM'S FORM ADV, PART 2A BROCHURE THAT MAY BE OBTAINED BY CALLING (833) 312-3824.

Conversation Starter:

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

How do your financial professionals make money?

Financial professionals are paid an annual salary. Financial professionals are not compensated based on your assets we service, the time and complexity required to meet your needs, products sold, product sales commissions, or revenue earned from financial professionals' recommendations.

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

No. You can go to Investor.gov/CRS for a free and simple search tool to research Stackwell and 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 services can be found in our Form ADV Part 2. For answers to the conversation starters or to download a copy of this relationship summary, please visit www.stackwellcapital.com or contact us at (833) 312-3824.

Conversation Starter

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

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Exhibit A – Material Changes to the
Customer Relationship Summary

1. April 20, 2022 Update:

- The minimum investment has been updated to \$10.

2. September 19, 2022 Update:

- Client Account rebalancing was amended to remove mandatory quarterly rebalancing.
- The Cash Sweep Program was amended. Stackwell receives no portion of revenue from the Program.
- The Firm's phone number was changed.