

Item 1 – Cover Page

Bespoke Investment Group LLC
105 Calvert St., Harrison, NY 10528
914-315-1248
www.bespokepremium.com
01/11/2021

This Brochure provides information about the qualifications and business practices of Bespoke Investment Group LLC. If you have any questions about the contents of this Brochure, please contact us at 914-315-1248. 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.

Bespoke Investment Group LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Bespoke Investment Group LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Bespoke Investment Group LLC who are registered, or are required to be registered, as investment adviser representatives of Bespoke Investment Group LLC.

Item 2 – Material Changes

This Item discusses only specific material changes that have been made to the Brochure since our last update and provides clients with a summary of such changes.

Since our last annual update dated March 20, 2019, the following material changes have been made:

1. Bespoke reduced its yearly management fees for Bespoke's equities and ETFs investment supervisory service. The yearly management fee for the equities and ETFs investment supervisory service is now 0.80% of the client's total account value.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Justin Walters, Principal at 914-315-1248 or justin@bespokeinvest.com.

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Item 4 – Advisory Business

Bespoke Investment Group LLC (Bespoke) is a wealth management and research firm founded in April 2007 by co-founders and principal owners Paul Hickey and Justin Walters.

Paul Hickey holds a Bachelor of Arts degree from College of the Holy Cross. He has five years work experience with Birinyi Associates, Inc. prior to co-founding Bespoke in April 2007. He was born in 1974.

Justin Walters holds a Bachelor of Arts degree from Yale University and has four years work experience with Birinyi Associates, Inc. prior to co-founding Bespoke in April 2007. He was born in 1981.

Bespoke Investment Group LLC requires its principals to hold a Series 65 license.

Bespoke offers two types of investment supervisory services. One invests in equities and ETFs and the other is an all-ETF portfolio. Bespoke tailors supervisory services to the individual needs of clients. Clients may impose restrictions on investing in certain securities or types of securities.

Bespoke offers three online subscription services titled Bespoke Newsletter, Bespoke Premium and Bespoke Institutional. These services provide general market research and are not personalized advice.

As of 12/22/2020, Bespoke had \$44,126,741 client assets under discretionary management.

Item 5 – Fees and Compensation

Bespoke's equities and ETFs investment supervisory service has a yearly management fee of 0.80% of the total account value. Bespoke's all-ETF investment supervisory service has a yearly management fee of 0.75% of the total account value. Compensation is payable quarterly, and the first payment is due after the first quarter that the account is with Bespoke. Compensation is deducted from a client's assets or billed to client depending on which method client chooses. Compensation structure is subject to change based on custodian's policies. A client may terminate his/her contract at any time, and a pro-rated refund will be issued immediately. Fees are negotiable.

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Bespoke's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Bespoke's fee, and Bespoke shall not receive any portion of these commissions, fees, and costs. Item 12 further describes the factors that Bespoke considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

The Bespoke Newsletter online subscription service costs either \$49/month or \$395/year. The Bespoke Premium online subscription service costs either \$99/month or \$995/year. The Bespoke Institutional online subscription service costs either \$195/month or \$1,995/year. Subscribers may cancel their subscription at any time. Fees are non-refundable.

Item 6 – Performance-Based Fees and Side-By-Side Management

Bespoke does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Bespoke provides investment supervisory services to individuals. There is a minimum account value of \$200,000, but exceptions may be made.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Bespoke's security analysis methods include charting, fundamental, technical, and cyclical. The main sources of information Bespoke uses include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, timing services, annual reports, prospectuses, filings with the SEC, and company press releases. The investment strategies used to implement any investment advice given to

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clients include long-term purchases (securities held at least a year), short-term purchases (securities sold within a year), trading (securities sold within 30 days), short sales, margin transactions, covered option writing. Investing in securities using any of the above investment strategies involves risk of loss that clients should be prepared to bear. Frequent trading can affect investment performance through increased brokerage and other transaction costs and taxes.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Bespoke or the integrity of Bespoke's management. Bespoke has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Bespoke is not actively engaged in a business other than giving investment advice. Bespoke is not registered as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading adviser. Bespoke has no arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment adviser, financial planning firm, commodity pool operator, commodity trading adviser, futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or entity that creates or packages limited partnerships.

Bespoke or a related person is not a general partner in any partnership in which clients are solicited to invest.

Item 11 – Code of Ethics

The Code of Ethics of Bespoke Investment Group LLC must be read and signed by every employee, member or consultant of Bespoke. The objective of this Code of Ethics is to subject all business dealings and securities transactions undertaken by such personnel, whether for clients or for personal purposes, to the highest ethical standards. Bespoke expects its personnel to premise their conduct on fundamental principles of openness, integrity, honesty, and trust. The Code of Ethics requires that personnel of Bespoke protect

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the confidentiality of the information about Bespoke and its clients, act appropriately as a fiduciary toward clients, avoid any illegal or unethical activities, avoid conflicts of interest and comply with Bespoke's personal trading policy, which is part of the Code of Ethics. A client wishing to obtain a complete copy of Bespoke's Code of Ethics should contact Mr. Justin Walters at 105 Calvert Street, Harrison, NY 10528. Phone: 914-315-1248. Email: justin@bespokeinvest.com. The Code of Ethics is available on request by any client or prospective client.

Principals from time to time may buy or sell for itself securities it also recommends to clients. The client's portfolio is always put first to insure that clients get the most beneficial prices on any transaction. At no time do principals buy securities that they have recommended to sell or vice versa.

Item 12 – Brokerage Practices

Bespoke provides clients with a list of preferred custodians, but the client has the option to specify where the account is housed. In the event that the client requests a specific custodian for their account, Bespoke will perform all transactions for that account with the specified custodian and commission rates will be determined by the custodian. If the client allows their account to be housed with the custodian of Bespoke's choice, Bespoke will use custodians which provide the best overall execution. In determining best execution, Bespoke will take factors into account which include speed and quality of transaction, as well as quality of custodian and research services provided.

Bespoke receives no soft dollar benefits from custodians.

Item 13 – Review of Accounts

From the time a relationship is established, Bespoke monitors and reviews accounts on an ongoing basis. Portfolio managers monitor each account on a daily basis to ensure that it remains consistent with the overall market outlook of Bespoke. More specifically, each position is reviewed to ensure that the original investment premise remains intact. All account reviews are conducted by Justin Walters and Paul Hickey, who are both managing partners and principals of Bespoke. In addition to the nature of the reviews described above, reviewers will also take into account any requests specific to an individual client.

More detailed account by account reviews are conducted on a quarterly basis or more frequently as market/economic decisions warrant. Additionally, if a client informs

Bespoke of a material change in their personal circumstances, Bespoke will review their account accordingly. Additionally, clients receive confirmations of all transactions in their account directly from the custodian.

Item 14 – Client Referrals and Other Compensation

Bespoke does not have any arrangements, oral or in writing, where it is paid cash by or receives some economic benefit from a non-client in connection with giving advice to clients. Bespoke does not have any arrangements, oral or in writing, where it directly or indirectly compensates any person for client referrals.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Bespoke urges clients to carefully review such statements from custodians. Bespoke does not provide statements to clients and does not act as a custodian for any clients.

Item 16 – Investment Discretion

Upon formation of an investment advisory relationship, clients give Bespoke the right, unless otherwise noted, to buy and sell any securities which are deemed to be in the best interest of the client's investment objectives. Bespoke is given the authority to determine without client consultation the type and amount of securities to be bought or sold. When selecting securities and determining amounts, Bespoke observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Bespoke in writing.

Item 17 – Voting Client Securities

Bespoke, as a matter of firm policy, has a responsibility for voting proxies for portfolio securities consistent with the best economic interests of the clients. Our policy and practice includes the responsibility to monitor corporate actions, receive and vote client proxies and disclose any potential conflicts of interest as well as making information available to clients about the voting of proxies for their portfolio securities and maintaining relevant and required records. Clients may request information regarding how Bespoke voted a client's proxies, and clients may request a copy of the firm's proxy policies and procedures by emailing justin@bespokeinvest.com

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Bespoke's financial condition. Bespoke has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and Bespoke has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Requirements for State-Registered Advisers have been supplied elsewhere in this Form ADV.