

Define Financial, LLC is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, which principally include Comprehensive Financial Planning & Discretionary Investment Management Services. Through personal discussions in which goals and objectives based on your particular circumstances are established, we develop your personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine your individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss your prior investment history, as well as family composition and background.

Our discretionary authority to buy, sell, and otherwise transact in securities in your account(s) is granted in our advisory agreement and is only limited by your reasonable restrictions or our mutual ability to terminate the advisory agreement. Our advice is not limited to certain types of investments. We do not offer proprietary products. We do not have a minimum account size or investment amount to retain or maintain our advisory services; however, our Comprehensive Financial Planning & Discretionary Investment Management Services are subject to a minimum annual fee of \$20,000.

Regular monitoring of your account(s) is included as part of our standard Investment Management Services, with reviews typically occurring at least annually. It is important that you keep us apprised of your financial situation so we can conduct more frequent reviews if necessary.

More detailed information about our services may be found in [Items 4 and 7 of our Form ADV Part 2A brochure https://adviserinfo.sec.gov/firm/brochure/286648](https://adviserinfo.sec.gov/firm/brochure/286648).

Conversation Starters

- “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?

Retail investors will generally incur the following fees charged by us: asset-based fees, fixed fees, and hourly fees. Our asset-based fee generally ranges up to 0.95% per annum, charged quarterly in advance. Our fixed fees generally range from \$20,000 to \$40,000 per annum, charged monthly, quarterly, or biannually as agreed. Our hourly rate is \$500 per hour. In addition, retail investors will also generally incur the following fees and costs charged by third-parties: custodian fees, account maintenance fees, product expenses such as internal expense ratios, and transaction charges.

When we charge an asset-based fee, the more assets there are in your account(s), the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account(s). When we charge a fixed fee, such fee is typically based on the nature and complexity of your financial situation and we are therefore incentivized to either construe existing complexity or recommend the introduction of additional complexity to your financial situation. When we charge an hourly fee, we are incentivized to incur more time in performing our services on your behalf.

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 what fees and costs you are paying.

More detailed information about our fees and costs may be found in [Item 5 of our Form ADV Part 2A brochure](#).

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.

The custodian(s) we recommend provide(s) us with various products and services that are intended to directly benefit you, us, or both of us. To the extent a custodian provides us products or services that don't directly benefit you, this creates an incentive to recommend that custodian. To learn how we address this incentive, please refer to [Item 12 of our ADV Part 2A brochure](#).

We have entered into a referral arrangement with an independent and unaffiliated third-party investment adviser registered with the SEC, whereby we will refer certain prospective financial planning clients in exchange for compensation. This creates an incentive for us to refer prospective financial planning clients accordingly. To learn how we address this incentive, please refer to [Item 14 of our ADV Part 2A brochure](#).

Conversation Starter

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

More detailed information about our conflicts of interest may be found in our [Form ADV Part 2A brochure](#).

How do your financial professionals make money?

Our financial professionals are compensated based on a combination of a salary, customary bonus, and the potential for additional compensation based on clients introduced to the firm by the financial professional or that are directly serviced by the financial professional. They are not compensated based on the sale of a particular product and do not earn commissions.

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

No. You may visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Conversation Starter

“As a financial professional, do you have any disciplinary history? For what type of conduct?”

Additional Information

You can find additional and up-to-date information about our investment advisory services and request a copy of the relationship summary by visiting <https://www.definefinancial.com> or calling (858) 345-1197.

Conversation Starter

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