



Client Relationship Summary

October 18, 2023

1. **Introduction**

SPG Advisors, LLC (“SPG”, “we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a Registered Investment Adviser (“RIA”). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, 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://www.investor.gov/CRS). The site also provides educational materials about broker-dealers, investment advisers and investing.

2. **Relationships and Services**

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary and non-discretionary investment management and financial planning and consulting services to individuals, trusts, and estates (our “retail investors”).

When a retail investor engages us to provide investment management services, we shall monitor, on at least an annual basis, the investments in the accounts over which we have investment authority. When engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. When engaged on a non-discretionary basis, the retail investor makes the ultimate decision to buy or sell investments. In either case, our investment authority over your account(s) shall continue until our engagement is terminated.

We may provide investment management services directly to the retail investor, or we may allocate the retail investor’s assets to unaffiliated sub-advisers and third-party managers. We may also be engaged in conjunction with a third-party investment adviser under a co-provider agreement, under which the retail investor’s assets are managed by a third-party investment adviser, while we provide ongoing consultative services to the retail investor and serve as a liaison between the retail investor and third-party adviser.

When a retail investor engages us to provide financial planning and consulting services, we rely upon the accurate information provided by the retail investor and/or other professionals for our review, and do not verify or monitor any such information while providing our services. Our financial planning and consulting services are generally provided on a standalone basis. Our financial planning and consulting services are completed upon the communication of our recommendations to the retail investor.

We do not limit the scope of our investment advisory services to proprietary products or to a limited group or type of investment. We generally require a minimum asset level of \$500,000 for investment advisory services, which minimum may be waived or reduced at our sole discretion. We generally do not impose a minimum annual fee.

Additional Information

For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7, respectively in our [ADV Part 2A](#).

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?*

3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

We provide our investment advisory services on a fee basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our "AUM Fee"). Our annual AUM Fee is negotiable but will never be higher than 1.50% of client assets, depending on a number of factors including the dollar amount of assets placed under our management, the complexity of the overall engagement, and other factors. We typically deduct our AUM Fee from one or more of your investment accounts. For co-provider engagements, our portion of the total AUM fee ranges from 0.25% to 1.00% of client assets, and the co-provider's portion of the total AUM fee ranges from 0.2% to 0.45%. Both portions of the AUM fee will be assessed in advance, on a quarterly basis. Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage.

We typically provide our standalone financial planning and consulting services either on a fixed fee basis, generally ranging from \$750 to \$5,000, depending on the scope and complexity of the engagement, or on an hourly rate basis of up to \$150 per hour. Clients may be asked to pay up to fifty percent (50%) of the estimated financial planning and consulting fee in advance.

DST investments will have a separate and distinct fee. The amount invested will be included in the assets under management only to calculate the amount of the DST fee. Otherwise, the DST investments will not be included in the assets under management when calculating the standard investment advisory fee.

Other Fees and Costs

Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). These charges will be assessed in accordance with the qualified custodian's transaction fee/brokerage commission fee schedule. In addition, relative to certain mutual fund, REITs, DSTs and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund expenses).

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.

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?

Additional Information

For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [ADV Part 2A](#). A copy of our Part 2A is also available at: <https://adviserinfo.sec.gov/firm/summary/284496>

What are your legal obligations to me when acting as my investment adviser?

When we act as your investment adviser, we are required to act in your best interest and not to 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:

- We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.
- We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement

Accounts that we manage for an asset-based fee, which could have the effect of increasing our compensation.

Conversation Starter

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

Additional Information

For more detailed information about our conflicts of interest, please review our [ADV Part 2A](#).

How do your financial professionals make money?

Our financial professionals are generally compensated based on the amount of advisory fees collected with respect to that financial professional's clients. If you have questions about the manner in which your financial professional is compensated, we encourage you to speak with your financial professional.

4. Disciplinary History

There is no disciplinary history to report.

5. Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Justin Lohman, at any time to request a current copy of our ADV Part 2A or this Form CRS. Our Chief Compliance Officer may be reached by phone: 425-821-9442

Conversation Starter

Who is my primary contact person?

Is he or she a representative of an investment adviser or broker-dealer?

Who can I talk to if I have concerns about how this person is treating me?

