

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

We are an investment adviser registered with the Securities and Exchange Commission that offers advisory accounts and services rather than brokerage accounts and services. This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information. There are some suggested questions to ask us at the end of each section.

Free and simple tools are available to research firms and financial professionals at 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?

Description of Services

Stonnington Group provides ongoing investment management services to retail investors, trusts, employer retirement plans, non-profit organizations and businesses. Account fees may be either **fixed** or **on-going asset-based fees** based on the value of cash and investments in the advisory account, or **other fee arrangements**. Fee details for each advisory service offered to retail investors are as follows:

We carefully review each client's financial situation to help them determine their goals (where do we want or need our savings to be in ten years?), tolerance for risk (how will a mild, moderate or steep decline in value make us feel?), and look at your overall financial picture (income, taxes, liabilities, insurance coverage, retirement funds and expected retirement date).

We will determine how much of your account should be invested aggressively (high growth potential/high risk), moderately (modest growth potential/less risk/some income), or conservatively (low risk, regular or reliable income). These investments may include equities or stocks (shares in publicly-traded companies), bonds (government, municipal or corporate debt securities with guaranteed interest rates & maturities), exchange-traded or mutual funds (shares in a portfolio of many stocks in a variety of companies and industries), real estate investment trusts ("REITs" – shares in a portfolio of various real estate assets), or other types of investment suitable to your needs and goals.

All accounts are monitored on a regular basis for how market, economic, current events and other external conditions are affecting the performance of our clients' portfolios.

Our client accounts are primarily non-discretionary. This means we use our discretion to adjust your investments, and do not always contact you in advance for approval to make purchases and sales. This allows us to quickly react to changes in the values of your assets. However, we welcome your input, and if your portfolio contains "legacy" assets (long-held stock positions) or assets with a very high or very low cost basis (the price you paid for the shares), we will consult with you before we make any transactions in those shares.

Asset Management Services

- *Description of Services:* We offer asset management services where we will provide you advice on a regular basis. We will discuss your investment goals, help you design a strategy to achieve your investment goals, and regularly monitor your account. We will contact you by your preferred method of contact at least annually to discuss your portfolio. We will ask you to choose your desired frequency at account opening. *Limited Investment Offerings:* Our investment advice will cover a broad selection of investments, depending on your investment objectives, risk tolerance and other factors. Other firms could provide advice on a wider range of choices, some of which might have lower costs.
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- *Account Minimums & Other Requirements:* We require that you invest at least **\$1,000,000** (per household) to obtain our asset management services, subject to exception. You will be billed an on-going **asset-based fee** at the end of each month for our services, based on the value of the cash and investments in your advisory account.
- *Investment Authority:* You can choose an account that allows us to buy and sell investments in your account without asking you in advance (a "discretionary account") or we may give you advice and you decide what investments to buy and sell (a "non-discretionary account"). If you choose a non-discretionary account, you will make the ultimate decision to buy or sell an investment. However, you might miss out on purchase or sale opportunities if we are unable to reach you in a timely manner.

Financial Planning Services

- * We offer financial planning services that involve preparing a financial plan for you based on information and documentation you provide to us including your financial objectives, risk tolerance, financial resources, family situation, and future financial goals. The plan will include recommendations for a course of activity or specific actions for you to take. You make the decision to implement any recommendations.
- * Once we deliver your financial plan, we do not monitor your financial situation on an ongoing basis. You must contact us if you have any significant changes in your financial situation and we will update your plan upon your request..

QUESTIONS TO ASK US:

- ▶ *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?*

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

WHAT FEES WILL I PAY?

Fees and costs affect the value of your account over time. The following summarizes the fees and costs you will pay for direct application services.

Fees and costs affect the value of your account over time. The following summarizes the fees and costs you will pay for our advisory services. Fees are assessed at an annual rate of 1.5% of managed assets under \$2 million, and 1% for assets in excess of \$2 million. We will negotiate lower fees as appropriate for the circumstances. Fees are calculated monthly based on the value of your portfolio on the last business day of the previous month and will be deducted directly from your account(s) unless other arrangements are made. Some investments will incur a commission or other fees in addition to the management fee. These fees are normally charged at the time the investment is made. These fees will be disclosed in any materials provided to you in advance of making the investment. You should read any prospectus or offering documents carefully and question your advisor on any matters you do not fully understand.

Care will be taken to prevent the advisor being paid twice for the same investment. For example, if an investment is made in a private fund which will pay the advisor an advance or ongoing commission, that investment may be exempted from the monthly advisory fee calculation.

Asset Management Services Fees

- * The amount you pay to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted directly from your account.
- * You will sometimes pay a transaction fee when we buy and sell an investment for you. You may also pay fees to a broker-dealer or bank that will hold your assets such as custodian fees and account maintenance fees.
- * Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time.
- * The more assets you have in the advisory account, including cash, the more you will pay us. Therefore, we have an incentive to increase the assets in your account in order to increase our fees. You pay our fee monthly even if you do not buy or sell.

Financial Planning Services Fees

- * No additional fee. Financial Planning services are included in the Advisory Fee.

As registered Investment Advisors, we are held to a fiduciary standard that covers our entire investment advisory relationship with you including monitoring your portfolio, investment strategy, and investments on an ongoing basis, among other requirements.

When we act as your investment adviser, we must 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.

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.

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS 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 interests ahead of yours. At the same time, the way we make money creates some conflicts with your interest. You should understand and ask us about these conflicts because they can affect the services and investment advice we provide you.

- * We can make extra money if you act on our financial planning recommendations and you choose to open an advisory account through us.
- * Your financial professional can receive more money by advising you to invest in an insurance product or private fund and you choose to purchase such products through that financial professional.
- * We charge clients different fees for the same investment strategy.
- * Your financial professional invests in his or her own personal account in securities that are traded in your portfolio.

FOR ADDITIONAL INFORMATION, please see our [Form ADV Part 2A&B](#) brochure Items 4, 5, and 10 and any brochure supplement your financial professional [provides](#).

QUESTIONS TO ASK US:

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

DISCIPLINARY HISTORY

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

NO

Please visit www.investor.gov for a free search tool to research us and our financial professionals.

QUESTIONS TO ASK US:

- ▶ *As a financial professional, do you have any disciplinary history? For what type of conduct?*

ADDITIONAL INFORMATION

HOW DO I GET ADDITIONAL INFORMATION ABOUT YOUR FIRM AND SERVICES?

For additional information about our firm and its advisory services, please see our Form ADV Brochure on www.adviserinfo.sec.gov/IAPD or www.investor.gov/crs and any brochure supplement your financial professional provides.

Call us at 626.469.8166 to request up-to-date information and request a copy of the relationship summary.

QUESTIONS TO ASK US:

- ▶ *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?*

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SEC-REGISTERED INVESTMENT ADVISOR *(Registration does not imply endorsement)*