

## Cambridge Investment Research Advisors, Inc. Form CRS

Cambridge Investment Research Advisors, Inc. ("CIRA") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. 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](http://Investor.gov/CRS), which also provides education materials about broker-dealers, investment advisers, and investing. Please refer to the Form CRS of our affiliated broker-dealer, Cambridge Investment Research, Inc., for information regarding brokerage services.

### What investment services and advice can you provide me?

CIRA offers investment advisory services to retail investors. These services include asset management, financial planning and consulting, retirement planning and consulting, and wrap fee programs. We also provide advisory services by referring clients to unaffiliated investment advisers. If we charge an ongoing asset-based fee, we will perform ongoing monitoring of your account(s) based upon the scope of services we provide as described in our agreement(s). If we only provide one-time services (i.e., creating a financial plan), we will not monitor your account(s). All recommendations regarding your advisory account will be made in an advisory capacity. When we make a recommendation to you, we will expressly tell you orally which account we are discussing.

You have the choice to receive non-discretionary or discretionary services from us. When we provide non-discretionary services to you, you make the ultimate decision regarding the purchase or sale of investments. When you authorize us to provide discretionary services to you, we can buy and sell investments in your account without discussing with you in advance. While we offer a wide variety of investment products and types of investments, CIRA has created a unified managed mutual fund list that specifies the recommended share class for each fund for use in managed accounts. We have a minimum account size requirement of \$5,000 before you can open an account but exceptions may apply for certain programs or account types. Please refer to our Form CRS supplement for further details.

**For additional information**, please visit the following:

- [CIRA Form ADV; https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/)
- [Form CRS Supplement; https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/)

Here are some questions you can use to start a conversation with your financial professional:

- 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 will pay a fee for our services based upon the type of service you receive. This can include asset-based fees, fixed fees, hourly fees, set-up fees and program fees. Any fees paid and the frequency charged will be agreed upon by you when contracting with CIRA for investment advisory services.

- Asset-based fee – the fee is a percentage of all assets in your account, charged on an ongoing basis
- Fixed fee – the fee is a set amount, charged either one-time or on an ongoing basis
- Hourly fee – the fee is a set amount and based on the aggregate number of hours of service provided
- Set-up fee – the fee is a set amount, charged one-time
- Program fee – the fee is an inclusive, or wrap, fee including an asset-based fee for services, custodial and trading fees, strategist fees (if applicable) and set-up fees (if applicable), charged on an ongoing basis

If you pay an asset-based fee, the more assets there are in your account, the more you will pay in fees. This gives us an incentive to encourage you to increase the assets in your account. If you pay a wrap fee, this fee can be higher than a typical asset-based fee because it includes the custodial and trading fees for your account. If you pay an hourly fee, this gives us an incentive to incur more time providing services to you.

You will typically also pay other fees, depending on your account type. These fees include custodian fees, account maintenance fees, transactional fees, and other ancillary fees that are outlined in CRS Supplement.

**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.**

**For additional information**, please visit the following:

- [CIRA Form ADV](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/); <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/>
- [Form CRS Supplement](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/); <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

Here is a question you can use to start a conversation with your financial professional:

- 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. Please refer to our Form CRS supplement for further details.

- Revenue sharing
- Third Party Payments

**For additional information**, please visit the following:

- [CIRA Form ADV](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/); <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/>
- [Form CRS Supplement](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/); <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

Here is a question you can use to start a conversation with your financial professional:

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

**How do your financial professionals make money?**

Our financial professionals receive fees for the investment advisory services they provide. These fees are one-time and/or ongoing, and are based on a fixed rate and/or as a percentage of assets in your account. Fixed rate fees are agreed upon by you and the financial professional, and are based on the time and complexity it takes to meet your needs. Certain financial professionals will also receive cash or non-cash compensation, such as merchandise, gifts, technology, travel expenses, and lodging, directly from investment managers or sponsors as further detailed our Form CRS Supplement linked here. As noted above, our financial professionals have an incentive to have more assets in your account if they are paid by an asset-based fee. If they receive an hourly rate, they have an incentive to bill for more hours of work. Financial professionals who receive cash or non-cash compensation have an incentive to sell more of that sponsor or manager's products.

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

Yes. Visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

Here is a question you can use to start a conversation with your financial professional:

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

**Additional Information**

**For additional information**, please visit the following:

- [CIRA Form ADV](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/); <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/>
- [Form CRS Supplement](https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/); <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

If you would like additional, up-to-date information or a copy of this disclosure, please call 888-245-0452.

Here are some questions you can use to start a conversation with your financial professional:

- 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?

## Cambridge Investment Research, Inc. Form CRS

Cambridge Investment Research, Inc. (“Cambridge”) is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer. 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, which also provides education materials about broker-dealers, investment advisers, and investing. Please refer to the Form CRS of our affiliated registered investment advisor, Cambridge Investment Research Advisors, Inc., for information regarding investment advisory services.

### What investment services and advice can you provide me?

Cambridge offers brokerage services to retail investors. These services include buying and selling securities, and investment recommendations to retail investors. We do not provide ongoing monitoring of your account, however, our financial professionals may voluntarily review your account on a periodic basis for purposes of providing buy, sell or hold recommendations. All recommendations regarding your commission account will be made in a broker dealer capacity. When we make a recommendation to you, we will expressly tell you orally which account we are discussing.

We offer a wide variety of investment products and types of investments. We do not impose account minimums.

**For additional information**, please visit the following:

- *Form CRS Supplement*; <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

Here are some questions you can use to start a conversation with your financial professional:

- Given my financial situation, should I choose a brokerage 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 will pay a commission for purchasing or selling a security, which is a transaction-based fee. The amount of the commission is typically a percentage of the amount of money you invest. Depending on the product purchased, the commission will be charged as a one-time fee, either at the time of purchase or sale, and/or will be charged on an ongoing basis.

When you buy or sell your securities, you will be charged more when there are more trades in your account, and, therefore, there is an incentive to encourage you to trade more frequently. You will also typically pay other fees depending on your account type; these fees include custodian fees, account maintenance fees, transactional fees, and other ancillary fees that are outlined in the Form CRS supplement.

In addition, there are different fees related to different products, such as mutual funds, variable annuities, exchange traded funds, etc. Please refer to the prospectus for other details.

**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.**

**For additional information**, please visit the following:

- *Form CRS Supplement*; <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

Here are some questions you can use to start a conversation with your financial professional:

- 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 providing recommendations? How else does your firm make money and what conflicts of interest do you have?**

**When we provide you with a recommendation**, 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 recommendations we provide you. Here are some examples to help you understand what this means.

- Revenue sharing – some sponsors or managers of investments share a portion of the revenue they earn on those investments with us, as do some clearing firms with respect to revenue they earn from clearing transactions in your accounts based on clearing fees increased on our behalf. This creates an incentive to recommend a particular sponsor, manager, or clearing firm.
- Third Party Payments

**For additional information**, please visit the following:

- *Form CRS Supplement*; <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

Here is a question you can use to start a conversation with your financial professional:

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

**How do your financial professionals make money?**

Our financial professionals receive commissions for products purchased or sold, and this commission will vary based on the type of product, the amount of your assets, and the time and complexity required to meet your needs. Certain financial professionals will also receive cash or non-cash compensation, such as merchandise, gifts, technology, travel expenses, and lodging, directly from product providers and sponsors as further detailed in the Form CRS Supplement.

Some products pay a higher commission than others; therefore, your financial professional has a conflict of interest to recommend a product that pays higher compensation. Financial professionals who receive cash or non-cash compensation have an incentive to sell more of that sponsor or manager's products.

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

Yes. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Here is a question you can use to start a conversation with your financial professional:

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

**Additional Information**

**For additional information**, please visit the following:

- *Form CRS Supplement*; <https://www.joincambridge.com/information-for-investors/investor-resources/cambridge-disclosures/form-crs-supplement/>

If you would like additional, up-to-date information or a copy of this disclosure, please call 888-245-0452.

Here are some questions you can use to start a conversation with your financial professional:

- 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?