

CLIENT RELATIONSHIP SUMMARY (Form CRS)
January 2023

INTRODUCTION

Stark Financial Advisers (“SFA”) is registered with the State of Florida as an investment adviser. Brokerage and investment advisory services and fees differ; it is important for you to understand the differences. 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 and provide advisory accounts and services rather than brokerage accounts and services.** Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

Description of Services

>We offer investment advisory services (asset management) to *retail investors* (individuals, pension, and profit-sharing plans, corporations and other business entities).

>We will discuss with you your investment objectives, risk tolerance, investment horizon and liquidity needs. Based upon our discussions, we will recommend a suitable investment strategy ranging from Very Conservative to Aggressive risk.

>We offer discretionary authority asset management (we buy and sell investments in your account without asking you in advance). The discretionary authority continues as long as your account remains open.

>As part of our standard service, we monitor your investments on an ongoing basis and rebalance your portfolio at least quarterly.

>We are an “asset allocation” manager. Your investments will be allocated to a variety of asset classes that may include fixed income securities (investment grade and high yield), domestic and international stocks (developed and emerging markets), real estate investment trusts, tangibles (gold, silver, energy and agricultural products) and cash or cash equivalents (money market funds). We do not make available, or offer advice with respect to, proprietary products.

>We have a minimum account requirement of \$100,000.00 for *retail investors* to open or maintain an account. However, this threshold may be reduced under certain circumstances.

Additional Information about our investment advisory services is available in our Form ADV, Part 2A Brochure.

Ask our financial professionals these key questions about our relationships and investment services and accounts:

>Given my financial situation, should I choose an investment advisory service? Why or why not?

>How do advisory accounts compare with typical brokerage accounts?

>How much would I pay per year for an advisory account? What would make those fees more or less? What services will I receive for those fees?

>Tell me how you and your firm make money in connection with my account?

>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 can you tell me about your legal obligations to me? If I have concerns about how you are treating me, who can I talk to?

>What is “wrap fee” pricing? What are the advantages and disadvantages? Which pricing method would be best for me?

FEES, COSTS, CONFLICTS, and STANDARD OF CONDUCT

What fees will I pay? How else does your firm make money and what conflicts of interest do you have?

>We make money from management fees earned, and from dividends, interest and capital gains earned from proprietary trading.

>Our fees are “asset based,” vary, and are negotiable. The amount you pay will depend on the services you receive and the amount of assets in your account. Please read Form ADV, Part 2A, Item 5 for additional information.

- >Generally, the more assets you have in the advisory account, including cash, the more you will pay us. We do offer reduced fees as an incentive to increase the assets in your account.
- >You pay our fee quarterly even if you do not buy or sell.
- >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.
- >You may also pay additional fees to a broker-dealer, or other financial institution, which will hold your assets (called “custody”).
- >You can choose to pay management fees, and most brokerage fees, in one combined “wrap fee” arrangement. Asset-based fees associated with a wrap fee program will include most transaction costs and fees to a broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee.
- >Investments in certain securities, such as traditional mutual funds, or exchange traded funds, may incur additional fees.
- >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 form me?

STANDARD OF CONDUCT

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.

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

>***We must abide by certain laws and regulations in our interactions with you.*** We are held to a fiduciary standard that covers our entire investment advisory relationship with you. Our interest can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether to agree to them.

How do your financial professionals make money?

>Your financial professional, if registered only with SFA, is compensated solely from a percentage of management fees that you pay.

>If your financial professional is dually registered with a securities broker/dealer, he/she may also earn compensation from commissions and fees that you pay to the firm. This is a potential conflict of interest.

DISCIPLINARY HISTORY

Do you or your financial professionals have legal or disciplinary history? Yes.

Disciplinary information is disclosed in our Form ADV (Item 11 of Part 1A).

You can also find a firm’s, or individual’s, disciplinary history using the Security and Exchange Commission’s search tool. Please visit, Investor.gov/CRS and select: “How do I find a firm’s or individual’s disciplinary history?”

>As a *retail investor*, ask: As a financial professional, do you have any disciplinary history? For what type of conduct?

>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?

ADDITIONAL INFORMATION

We encourage you to seek additional information on our advisory services.

>See our Form ADV brochure, on IAPD, at investor.gov, or on our website, starkadvisers.com.

>Form ADV and additional brochure supplements are also available by calling 561-243-3815 or 863-697-8024.

>To report a problem to the SEC visit: investor.gov or call the SEC’s toll-free investor assistance line at: (800) 732-0330.

>If you have a problem with your investments, account, or financial professional, contact us in writing at: 16950 U.S. Highway 441 N, Okeechobee, FL 34972.