

- ChangePath, 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 retail investors 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?

Our principal service offered to retail investors like you is Asset Management. Under this arrangement, you hire us to manage your accounts by investing them in securities. Prior to investing your assets, we obtain an understanding of your risk tolerance and investment objectives and then use that information to select an investment strategy appropriate for you. We offer investment advice with respect to a wide range of products such as: mutual funds, fixed income securities, traded real estate funds, equities, exchange-traded funds, and bonds. ChangePath may use other securities to help diversify a portfolio when applicable. Your strategy will likely include one or more investment models. All models consist of a thoroughly researched set of investments based on investment objective and risk level. We offer proprietary models and models managed by third parties. Depending on the model(s) chosen, either the third-party manager or ChangePath will purchase and sell securities in those using a pre-determined frequency or when necessitated by significant events in the market and typically again when you make significant deposits and withdrawals. (See [Form ADV Part 2A Item 4, Item 7](#)).

We also offer Financial Planning and Retainer services, which involves creating written recommendations tailored to your situation. Depending on your needs, a financial plan can include investment planning, insurance advice, retirement planning, cash flow management, debt consolidation, capital needs assessments, educational planning, estate planning, and business planning. You decide whether to implement any of our investment recommendations. You are also free to select any investment adviser, brokerage, insurance, or other provider to enact any portion of the plan. ([Form ADV Part 2A Item 4](#)).

Your financial professional will review your accounts on a periodic and ongoing basis taking into account your investment objectives and risk tolerance. Reviews will also be triggered by major market, economic, or political events along with changes to your financial situation. For us to be able to manage your accounts appropriately, it's important that you update us when your circumstances change. (See [Form ADV Part 2A Item 13](#)).

Most of our services are provided on a discretionary basis, which means you grant us written authority to buy and sell investments on your behalf without pre-approval of each investment. Our discretionary authority lasts for as long as you are our client. You may restrict our discretionary authority to certain asset classes or market sectors. We typically exercise discretionary investment authority when we invest your monies in our model(s) or those managed by a third-party. Sub-advisers we retain to assist with managing your account(s) also use discretion. You may, however, elect a non-discretionary basis whereby you either approve each trade prior to your IAR placing the trade, or you execute trades on your own behalf. (See [Form ADV Part 2A Item 16](#)).

What fees will I Pay?

You will pay either a monthly or quarterly fee charged in advance or arrears to ChangePath for the management of your accounts. The fee charged is a percentage of assets under management. If you are a financial planning or retainer client, you will pay either a fixed or hourly fee.

In addition to our fee, each qualified custodian may charge trade commissions and other transaction fees. Additionally, individual investment products may charge management fees. Insurance carriers may charge fees for variable annuities. If you have financial accounts not directly managed by ChangePath but reported on our platform, you will pay a monthly fee to the party providing this reporting service. Third-Party Administrators will also charge for company-sponsored retirement plans.

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?*

Because our fee is charged as a percentage of assets, the more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account.

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. (See [Form ADV Part 2A Item 5](#)).

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.

We offer proprietary models which are managed by our investment committee. This creates a conflict of interest as we retain a portion of the model management fee. ChangePath is also sub-advisor to the AdvisorShares STAR Global Buy Write ETF (VEGA) and earns a fee for these services. If we invest your assets in the VEGA ETF, we will usually receive a fee from this ETF in addition to the investment advisory fee from you. We mitigate these conflicts by vetting and providing access to third-party managed models and funds which are available to clients in lieu of our proprietary models and products.

ChangePath receives a marketing allowance from a corporate affiliate as compensation for assets invested in M+ unit investment trusts by ChangePath clients. This compensation is in addition to the fees we receive for the advisory services we provide to you. This presents a conflict of interest because we have a greater incentive to recommend these products which result in additional compensation to ChangePath. We mitigate this by recommending only products most suitable for you and by approving each sale of a unit investment trust to ensure that it is in your best interests.

In the event we choose a third-party adviser to manage your assets, we will be compensated by a fee sharing agreement. This creates a conflict of interest whereby there is an incentive to direct clients to the third-party investment advisers that provide us with a larger fee split. We mitigate this as we act in your best interests by recommending only those investments and managers that are most suitable for you.

More information about ChangePath's conflicts of interest and code of ethics are disclosed in [Form ADV](#) Item 8 and [Form ADV Part 2A](#) Items 5, 10, 11, 12, 13 and 14.

How do your financial professionals make money?

Our financial professionals are compensated via an advisory fee deducted from your custodial account. This is a conflict of interest as the more assets there are in your advisory account, the more you will pay in fees, thereby incentivizing us to encourage you to increase the account's assets. This conflict is mitigated by our fiduciary duty to only recommend financial decisions in your best interest. In the event that your fee arrangement with ChangePath is a fixed rate percentage regardless of the portfolio chosen, the percentage of the fee paid to your financial professional will shift depending on the cost of the model(s) chosen. This represents a conflict of interest because your financial professional has an incentive to recommend portfolios which result in a higher portion of your fee being paid to the financial professional. We mitigate this by recommending only portfolios most suitable for you and by routinely reviewing Client accounts to ensure that your interests are placed first. If you are a financial planning or retainer client, you will pay either a fixed or hourly fee. This creates a conflict of interest as the financial professional is incentivized to take longer in the planning process. We mitigate this conflict by prohibiting unreasonably high fees.

Some financial professionals are also representatives with broker-dealers or insurance agencies and may receive additional compensation based on specific products sold that is separate and distinct from compensation received for investment advice provided to you. You are under no obligation to use these outside services.

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

Yes. You may go to www.investor.gov/CRS for a free and simple search tool to research ChangePath and ChangePath's financial professionals.

You can find additional information about ChangePath by:

- Accessing our website at <https://www.changeopath.com/>
- Accessing our ADV filing at <https://adviserinfo.sec.gov/firm/summary/281213>
- Calling us at (888) 798-2360 where you can ask for the relationshipsummary
- Emailing us at info@changeopath.com

CONVERSATION STARTERS:

- *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?*
- *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?*