

Client Relationship Summary

12/01/2021

Introduction

San Blas Securities, LLC is a broker-dealer registered with the United States Securities and Exchange Commission (SEC) and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). San Blas Securities maintains securities accounts through a fully disclosed clearing relationship with RBC Correspondent Services and Axos Clearing (herein referred to as “clearing firm”). San Blas Securities is affiliated with SB Advisory, LLC, an SEC registered investment adviser firm. San Blas Securities LLC and SB Advisory, LLC are collectively referred to as “San Blas”, “Us”, “Our”, “We”. Some, but not all of our Financial Professionals are dually licensed and registered to offer services under the broker-dealer and the investment adviser, therefore it’s important that you ask your Financial Professional in what capacity they are able to act in as they may not be able to offer you both brokerage and investment advisory services. Brokerage and investment advisory services and the associated fees differ and it’s important that you understand the differences. Free and simple tools are available to research different 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?

Depending on their licensing and registration, our network of Financial Professionals is qualified to offer brokerage services, investment advisory services, or both. Each Financial Professional generally provides access to a range of investment products, such as stocks, bonds, mutual funds, unit investment trusts (UITs), options, exchange-traded funds (ETFs), life insurance, annuities and other various investment products. The range of investment options available to you may be limited depending on your investment size, ability to meet account minimum requirements, your personal suitability and other such qualifications. We encourage you to ask your Financial Professional whether any investment limitations or account requirements apply to you. Furthermore, you should ask your Financial Professional if the advice they are providing or the recommendations they offer are part of a brokerage service or advisory service. Some of the key differences between brokerage and investment advisory services are described below.

Brokerage Services

- We are an introducing broker-dealer, meaning we have a contract with a clearing firm who handles the execution and settlement of trade orders it receives from us and our clients. The clearing firm also holds your securities for safekeeping (known as having “custody” of your securities).
- In most cases, we provide recommendations to you on specific investments, but you make the final investment decisions for your account.
- We don’t monitor brokerage account investments for you, unless we state otherwise in writing.

Investment Advisory Services

- The investment advisory services we offer include asset management, financial planning and financial consulting.
- We manage accounts on a discretionary basis, meaning we will implement transactions without seeking your prior consent, however, you have the ability to impose restrictions on your account by making such request in writing.
- We’ll typically monitor accounts and specific investments within accounts, on an ongoing basis to align with your investment goals.
- We may use third party money managers; in which case your account is managed by an Adviser outside of SB Advisory Group.

For more detailed information about advisory services, please see Form ADV Brochure by [clicking here](#)¹. You can find additional information about brokerage services by [clicking here](#)².

QUESTIONS TO ASK YOUR PROFESSIONAL:

- » Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Why or why not?
- » How will you choose investments to recommend to me?

¹ <https://adviserinfo.sec.gov/firm/summary/154680>

² <https://www.sanblassecurities.com/disclosures>

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What fees will I pay?

Brokerage Services Fees

- Commission: We charge a transaction-based fee every time you buy or sell an investment. The amount you pay as a transaction-based fee varies according to the particular investment and amount invested. We collect these fees each time a transaction takes place, which creates an incentive for us to encourage you to trade often.
- For investments in stocks or ETFs, the transaction-based fee is usually charged as a separate commission or sales charge. For investments in bonds, this fee is typically included as part of the price you pay for the investment (called "markup or markdown").
- Sales Loads: For investments in certain products like mutual funds and annuities, we receive transaction-based fees from the investment product sponsor in the form of asset-based sales charges. These fees are based on the amount invested in a certain product and in some cases may also be dependent on how long you hold the investment position. These sales loads create an incentive for us to recommend certain products or product sponsors based on the fees we collect.

Investment Advisory Fees

- For investment advisory services, we typically charge an *asset-based fee* based upon an annual percentage of your assets under management. Advisory Fees will generally range from 1% to 2% annually, of a percentage of the value of your assets in the account we manage. The more assets you have in this type of account, the more you'll pay in fees, which creates an incentive to encourage you to increase the size of your account. Fees are negotiable.
- Minimum Account Size: Although we do not currently impose a minimum account size, transaction fees associated with mutual funds traded in an account held at TD Ameritrade may be higher for accounts that hold less than \$500,000 in total aggregated assets.
- Financial Planning/Financial Consulting: You will pay a maximum fee of \$200 per hour for financial planning and consulting services. This fee is negotiable between you and your Financial Professional.

Other Fees and Costs

If applicable to your account, you will also be charged other fees in addition to brokerage commissions and advisory fees, including: outside brokerage commissions, margin interest, custody fees and certain other expenses. You should understand that these fees are not charged by us if your investment is in an account that is held directly with the fund sponsor. Generally, our advisory fees don't include any brokerage commissions and other transactions costs, redemption fees, wire transfer fees, account closing fees, or any other charges imposed by the administrator, custodian, or other service provider.

You will pay fees and incur 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.

For more detailed information about the costs and fees you will pay for advisory services please see Form ADV Brochure by [clicking here](#)¹. You can find additional information about brokerage services by [clicking here](#)².

QUESTIONS TO ASK YOUR PROFESSIONAL:

- » Can you 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?

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What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you.

Here are some examples to help you understand what this means:

Revenue Sharing and Third-Party Payments: We receive compensation from third parties related to services like the use of margin and certain investments you make, like mutual funds, ETFs and annuities. This compensation includes ongoing distribution charges, such as 12b-1 fees or commission trails, which an investment product charges you and then pays to us. These payments create an incentive to recommend certain products and services which pay us more.

Proprietary Products and Principal Trading: We may now or in the future recommend certain investments which we manage, issue, or sponsor. When we act in these additional capacities we likely have an incentive to recommend these investments. In addition, in a brokerage account we can buy investments from you, and sell investments to you, from our own accounts (called "acting as principal"). We can earn a fee on these trades, so we have an incentive to encourage you to trade with us.

TurnKey Asset Management Program: For Advisory services, if you utilize our third-party money managers, SB Advisory will receive compensation as a percentage of assets under management for referring you to the respective program and its money managers with TurnKey Asset Management ("TAM"). The compensation we receive may be higher if you use TAM versus other money managers, therefore this creates an incentive for us to refer TAM over other third-party money managers available.

For more detailed information on these and additional conflicts of interest for advisory services please see Form ADV Brochure by [clicking here](#)¹. You can find additional information about brokerage services by [clicking here](#)².

ASK YOUR PROFESSIONAL:

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

How do your Financial Professionals make their money?

Our Financial Professionals are primarily independent contractors, although a portion are employees. The agreement between each Financial Professional and San Blas Securities sets out the payments we make to them. Those who provide investment advisory services receive a portion of the advisory fee you pay. Those who provide you brokerage services receive a portion of the commission from your trades. Receiving a portion of the advisory or brokerage fees you pay to us creates an incentive for them to encourage you to increase your investment account size or trade more frequently. Our Financial Professionals also receive different levels of compensation for selling different types of investments or services. This could include, for example, a share of the 12b-1 fees³, trail commission⁴, or sales loads⁵ paid to us by an investment product sponsor. Financial Professionals may also receive certain onboarding or hiring incentives such as bonuses and forgivable loans. They may also receive additional non-cash compensation such as travel to conferences or reimbursement for certain expenses.

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Do you or your Financial Professionals have legal or disciplinary history?

Yes. Visit investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

QUESTIONS TO ASK YOUR PROFESSIONAL:

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

Additional Information

For additional information about us, visit our website at www.sanblassecurities.com

If you have a problem with your investments, account or financial professional, or would like a copy of our relationship summary sent to you contact, please contact:

San Blas Securities

Attn: Chief Compliance Officer
3424 Peachtree Road NE, Suite 2200
Atlanta, Ga 30326
404.704.0406

QUESTIONS TO ASK YOUR PROFESSIONAL:

- » Who is my primary contact person?
- » Is he/she a representative of an investment adviser or a broker-dealer or both?
- » Who can I talk to if I have concerns about how this person is treating me?

* Sponsor means the insurance company, mutual fund, or other investment company.

** A 12b-1 fee is an annual marketing or distribution fee on a mutual fund. The 12b-1 fee is considered to be an operational expense and, as such, is included in a fund's expense ratio.

*** A trailing commission is a fee that you pay a financial professional each year that you own an investment. The purpose of a trailing commission is to give an advisor an incentive to review a client's holdings and provide advice.

**** A load is a sales charge paid by mutual fund investors to the brokers or agents who sell the fund to them.