



CLIENT RELATIONSHIP SUMMARY—FORM CRS

INTRODUCTION

High Falls Advisors, Inc. is an investment advisor registered with the Securities and Exchange Commission (SEC). Investment advisory and brokerage 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 educational materials about broker-dealers, investment advisors and investing. *This document is being provided to you to summarize all the available relationships and services we offer to retail investors.*

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer advisory services to retail investors which include the following: investment management, financial planning and consulting, and tax preparation. Before you open an investment account with us, we will meet with you first to understand your current financial situation, risk tolerance and goals. Based on your stated objectives, we will then recommend and implement an investment portfolio strategy. Your investment agreement with us gives us “**discretionary authority**” which means that we do not need to contact you when buying and selling within your account. Accounts and investments are continually monitored and we are available for ongoing advice. We will contact you at least annually to discuss your accounts and update your goals. Some of our account strategies require a minimum of \$100,000 in investable assets, however, we can make exceptions on a case by case basis. Our typical accounts are invested using mutual funds, exchange traded funds (ETFs), individual securities, fixed income securities, CDs, and cash.

For additional information, see Items 4 and 7 of our Firm Brochure (Form ADV Part 2) which is available online at www.highfallsadvisors.com.

Conversation Starters. Ask your financial professional—

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose the 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?

For investment management accounts, you will be charged an ongoing **asset-based** fee which means that the fee is calculated as a percentage of the assets invested in your account according to the fee schedule outlined in your advisory agreement with us. Our fees vary and are negotiable. Fees are calculated quarterly in arrears and with your permission are automatically deducted from your account each quarter. The more assets you invest in your account, the more you will pay in fees, and therefore **we have an incentive to increase your account assets**. Financial planning, consulting and tax preparation are also offered at a flat or hourly fee.

In addition to your advisory fee, some investments are charged a transaction fee when we buy or sell. These fees are charged and paid to the unaffiliated broker-dealer (custodian) that holds your account. There may also be charges and fees paid to the custodian for holding and maintaining your account. Some investment types (mutual funds and ETFs) also charge internal fees and expenses represented as the fund’s expense ratio.

Some of our advisors are also registered-representatives of an unaffiliated broker-dealer and they may offer you brokerage services through the broker-dealer. The fees charged in this capacity are different than the fees of our firm. The fees charged are a **transaction-based** commission each time you buy or sell a security within the brokerage account or an on-going fee (“trail”) paid out for as long as you hold the investment. As a result, there may be **an incentive to trade more frequently**.

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, see Item 5 of our Firm Brochure (Form ADV Part 2) which is available online at www.highfallsadvisors.com.

Conversation Starter. Ask your financial professional—

- Help me understand how these fees and cost 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 ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTERESTS DO YOU HAVE?

When we act as your investment advisor, we are held to a fiduciary standard that requires us to always 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 affect the recommendations we provide you. Here are some examples to help you understand what this means.

- We charge an asset-based fee which could encourage larger accounts with more assets under management.
- Our employees may buy or sell the same securities we recommend to you.
- Some advisors in our firm are registered representatives of an unaffiliated broker-dealer and/or are licensed insurance agents. When acting in this capacity, these activities may generate a commission because of our recommendations.

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Conversation Starter. Ask 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 firm's revenue is primarily the advisory fees from accounts we manage, however, we also may collect flat or hourly fees for our financial planning, consulting, and tax preparation services. Since some of our advisors are also licensed registered representatives of an unaffiliated broker-dealer and insurance agents, those advisors may also receive compensation in the form of transaction-based commissions as well as on-going fees ("trails"). Employees of our firm are paid a fixed annual salary and bonuses based on performance. Employees may also share in the firm's profits.

DO YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. We do not have any legal or disciplinary history to report. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals. You may check the background of this firm or your financial professional at <https://brokercheck.finra.org/> or <https://adviserinfo.sec.gov>.

Conversation Starter. Ask your financial professional—

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

ADDITIONAL INFORMATION. Your financial advisor is your primary contact person. For additional information about our services or to obtain a current copy of our Form CRS, please call **585-935-5300**.

Conversation Starter. Ask your financial professional—

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