

**Andrew Garrett, Inc.
Customer Relationship Summary
(FORM CRS)**

Updated: February 17, 2021

Introduction:

Andrew Garrett, Inc. (AGI) is registered with the Securities & Exchange Commission as both a broker-dealer and an investment advisor. The services and fees offered differ in the service provided and how our fees are charged. These differences are explained below, and it is important for you to understand the differences. There are free and simple tools available to research firms and financial professional's disclosure history at:

- **Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors and investing.**
- <https://brokercheck.finra.org>

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

Andrew Garrett, Inc., offers both brokerage and investment advisory services to retail investors. All recommendations regarding a brokerage account will be made in a broker-dealer capacity, and all recommendations regarding an advisory account will be made in an advisory capacity. When making a recommendation, we will expressly tell you orally which account type we are discussing.

Andrew Garrett, Inc Brokerage Services:

Our brokerage services include buying and selling securities including stocks and bonds, fixed and variable annuities, mutual funds, direct participation programs, alternative investment products, life insurance, unit investment trusts, 529 plans, and retirement plan consulting services and products.

One of our obligations to you when providing brokerage services is that we must act in your best interest and not place our interests ahead of yours when we recommend an investment or an investment strategy involving securities. Additionally, when we provide any service to you, we must treat you fairly and comply with several specific obligations. However, our interests can conflict with your interests. When we provide recommendations, we must eliminate these conflicts or tell you about them, and in some cases reduce them. If you open a brokerage account, you will pay us a transaction-based fee, generally referred to as a commission, every time you buy or sell an investment. You may select investments, or we may recommend investments for your account, but the ultimate investment decision for your investment strategy and the purchase or sale of investments will be yours. Depending on your preference, you will receive account statements in paper or electronic form. The frequency in which you receive statements and the party responsible for delivering statements depends on the brokerage service selected. We can also offer you additional services to assist you in developing and executing your investment strategy, but you might pay more. Unless we agree otherwise, we are not required to monitor your portfolio or investments on an ongoing basis. We may voluntarily, and without any agreement with you, review the holdings in your account for the purposes of determining whether to provide you with a recommendation. This voluntary review is not considered to be "account monitoring," and would not create an implied agreement with you to monitor the account.

The brokerage services may have account/ investment minimums, which are further detailed in the applicable Program Disclosures. Our brokerage services cover a limited selection of investments, and other firms could provide a wider range of investment choices, some of which might have lower costs. **The firm does not make, advise, or offer proprietary products.**

Andrew Garrett, Inc. Advisory Services: Our advisory services include several advisor programs (an account where no separate transactions charges apply and a single fee is paid for all advisory services and transactions), third-party advisory services, non-discretionary investment advisory services (including investment portfolio monitoring, financial counseling, review of accounts, and securities research), retirement plan consulting services and products, consulting services, and financial planning.

When providing advisory services, we are held to a fiduciary standard that covers our entire investment advisory relationship with you. As fiduciaries, investment advisers are required to act in the best interest of their clients and not place their own interests ahead of their clients. However, our interests can conflict with yours. When we provide recommendations, we must eliminate these conflicts or tell you about them, and in some cases reduce them.

If you open an advisory account, you will pay an ongoing asset-based fee for our services. As part of these services, we will offer you advice on a regular basis, discuss your investment goals, design with you a strategy to help achieve your investment goals, and regularly monitor your account, meeting with you at least annually.

There are different types of advisory accounts you can choose. You can select an advisory account that allows us to buy and sell investments in your account without asking you in advance (a "discretionary account"), or we may give you advice and you decide what investments to buy and sell (a "non-discretionary account").

For our discretionary services, a retail investor gives their financial professional or an investment manager the authority to buy and sell securities, either absolutely or subject to certain restrictions. This authority varies according to the advisory program, and there is a prohibition against exercising discretion in client accounts unless granted written authority to enter orders on behalf of a retail investor.

For our nondiscretionary services, a retail investor makes the ultimate decision regarding the purchase and/or sale of investments. For these nondiscretionary services, investment monitoring is offered as part of our standard services and is provided quarterly. Investment advice may be provided regarding asset allocation, investment portfolio construction, investment selection, or other services as agreed upon by both parties, and there may be limitations on investment offerings. The advisory services may also have account/investment minimums, which are further detailed in the applicable Program Disclosures.

Our investment advice only covers investments that are allowed according to the terms of each advisory program, and other firms could provide advice on a wider range of choices, some of which might have lower costs.

For Additional Information contact Andrew Garrett Inc. or see Andrew Garrett, Inc.'s Regulation Best Interest Disclosures (including Program Disclosures), Form ADV, Part 2A brochure (Items 4 and 7 of Part 2A or Items 4.A. and 5 of Part 2A Appendix 1) and other applicable documents.

Conversation Starters:

- ***"Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of service? Why or why not?"***

Conversation Starters

Ask your financial professional:

- **Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?"

The Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay. **Brokerage Transaction-based fees:** You will pay a fee (i.e. a commission) every time you buy or sell an investment. This fee is based on the specific transaction and not the value of your account. You could be charged more when there are more trades in your account, and the Firm may therefore have an incentive to encourage you to trade often. With stocks or exchange-traded funds, this fee is usually a separate commission. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a "mark-up" or "mark down"). With mutual funds, this fee (typically called a "load") reduces the value of your investment. Some investments (such as mutual funds and variable annuities) have internal expenses that will reduce the value of your investment over time. Also, with certain investments such as variable annuities, you may have to pay fees such as "surrender charges" to sell the investment if sold before a certain time period. Our fees vary. The amount you pay will depend, for example, on how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us. * **For additional information on our fee schedule and disclosures please go to www.andrewgarrett.com**

Advisory Asset based fees: You will pay an ongoing fee, either based on a percentage of assets under management or a flat yearly fee. The percentage fee at the beginning of each quarter based on the value of cash and investments in your advisory account. The more assets there are in your advisory account, the more you will pay in fees, and the Firm may therefore have an incentive to encourage you to increase the assets in your account. The flat yearly fee can be charged monthly.

The client can pay a flat percentage fee based on assets managed or a flat yearly fee. Fees can be assessed Monthly or Quarterly. For Monthly billing, the initial percentage fee will be based on the assets in the account at the time of approval, "inception date", as well as the number of days left in the initial month. After the initial month, billing will be based off the closing account valuation of the prior month as well as the number of days in the current month. For Quarterly billing, the initial percentage fee will be based on the assets in the account at the time of approval, "inception date", as well as the number of days left in the quarter. Each quarter the percentage fee is calculated on the market value of assets in the account at the end of the previous quarter and charged quarterly in advance

For additional details on how fees are calculated, refer to your investment advisory agreement and program disclosures specific to your advisory 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."

Conversation Starters

Ask 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 as my broker-dealer or when acting as my investment advisor? 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 advisor, 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 interest. 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.

As you work with your financial professional to determine the right investments and services to achieve your investment goals, it is also important for you to understand how the Firm is compensated. This is because various forms of compensation may create potential conflicts of interest, and it is important for you to evaluate potential conflicts of interest in making investment decisions.

Certain sources of compensation may be familiar to you because they are directly associated with your account type or investments. Other forms of compensation, however, may not be as familiar, because they do not directly affect the amount you pay. Below are several examples of ways we make money and the associated conflicts of interest.

- ***Third-party payments*** are a type of compensation we receive from third parties when we recommend or sell certain investments. ***Principal trading*** involves investments we buy from a retail investor, and/or investments we sell to a retail investor, for or from our own accounts, respectively. The Firm only offers "riskless" principal transactions, in which a broker-dealer, after having received an order to buy/sell a security, purchases/sells the security as principal at the same price to satisfy the order to buy/sell.
- Products or services which provide revenue to the Firm, including third-party payments, revenue sharing payments, and principal trading, could indirectly provide incentives to financial professionals to recommend such products over similar products or services which do not provide revenue to the Firm.

Additionally, commissions or other compensation related to one financial service provider, product, investment, or service may be higher than commissions or compensation payable related to a comparable provider, product, or service. Those higher rates of compensation could provide incentives to the Firm (and our financial professionals) to recommend certain providers, products, or services over those with lower rates of compensation.

It is important to note that while we will take reasonable care in developing and making recommendations to you, securities involve risk, and you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please consult any available offering documents for any security we recommend for a discussion of risks associated with the product. We can provide those documents to you or help you to find them.

Conversation Starters

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 financial professionals can offer various types of advisory and brokerage programs, platforms and services, and can earn more or less if a certain type of service, program or platform is recommended. They are also compensated in a variety of ways. Their compensation can be based on factors such as: the amount of client assets they service; the time and complexity required to meet a client's needs; the product sold (i.e., differential compensation); product sales commissions; or revenue the Firm earns from the financial professional's advisory services or recommendations. In their day-to-day business, it is not uncommon for our financial professionals to face decisions about whether a particular action or circumstance constitutes a conflict of interest. While many conflicts can be avoided, at least in theory, there are some conflicts that, as a practical matter, cannot be avoided. Since our financial professionals are compensated for the services they provide, this presents an inherent conflict of interest.

Commission-based financial professionals charge nothing directly to their clients and are compensated solely through commissions. In contrast, fee-based financial professionals charge a fee directly to their clients for their services. This fee can be structured in multiple ways, such as an hourly rate, a monthly retainer, an annual fee, or a percentage of assets under management.

Our financial professionals may have conflicts of interest beyond those disclosed by the Firm, and those financial professionals will disclose, where appropriate, any additional material conflicts of interest not later than the time of a recommendation, and any such disclosure may be made orally.

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

- *Yes there is a disciplinary history. You can review the legal or disciplinary history of our firm or financial professionals by visiting **Investor.gov/CRS** for a free and simple search tool as well going to Broker check at <https://brokercheck.finra.org>*

Conversation Starters

Ask your financial professional: **As a financial professional, do you have any disciplinary history? For what type of conduct?**

Additional Information

For additional information about our firm and our services, visit Investor.gov or BrokerCheck (<https://brokercheck.finra.org>), our website (www.andrewgarrett.com), and your account agreement. For additional information on advisory services, see our Form ADV brochure on IAPD, on Investor.gov, or on our website and any brochure supplement your financial professional provides. Additionally, you can request up-to-date information and/or a written copy of Form CRS by calling Andrew Garrett, Inc at (800) 899-1883.

To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. To report a problem to FINRA, call (301) 590-6500. If you have a problem with your investments, account or financial professional, contact us in writing at Andrew Garrett, Inc., 52 Vanderbilt Ave Suite 510 New York, NY 10017

You can also receive an updated copy of our FORM CRS by writing to us at Andrew Garrett, Inc. 52 Vanderbilt Ave., 5th Floor New York, NY 10017.

Conversation Starters

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

*** For additional information on our fee schedule and disclosure please go to Andrew Garrett's website at : www.andrewgarrett.com** - Securities and investment advisory services are offered through Andrew Garrett, Inc, A broker-dealer, registered investment advisor and member of FINRA, MSRB and SIPC.