

Form CRS Client Relationship Summary

Red Tortoise, LLC

June 15, 2020

Item 1 – Introduction: Is an investment advisory account right for you?

Red Tortoise, LLC is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ and that it is important for you 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.

Item 2 – What investment services and advice can you provide me?

We offer investment advisory services to retail investors. Our principal services include Investment Advisory, Wealth Management, Financial Planning, and Investment Consulting services.

- We provide continuous and regular supervisory and/or management services. As part of our standard management services we will monitor your portfolio's performance on a continuous basis and rebalance the portfolio whenever necessary, as changes occur in market conditions, your financial circumstances, or both. Our management services are offered on either a *discretionary* basis or, in limited circumstances, on a *non-discretionary* basis. *Discretionary* authorization allows us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. *Non-discretionary* management services require us to obtain your approval prior to executing any transactions on behalf of your account. You may limit our *discretionary* authority by setting a limit on the types of securities to be purchased for your account, for example. You must provide us with your restrictions or guidelines in writing. You are under no obligation to act upon any of our recommendations under a non-discretionary engagement.
- Financial planning generally includes advice that addresses one or more areas of your financial situation. Planning and consulting services are generally *non-discretionary* in nature, as we will provide advice, but you are responsible for implementation unless you have retained us for management services. We do not monitor the investments made as a result of recommendations provided to you under planning or consulting services unless you have retained us for management services. Ongoing planning and consulting services are also available. You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our firm or by using any advisory/brokerage firm you choose.

We do not limit our advice to proprietary products, or a limited menu of products or types of investments. We do not receive compensation from any third party. We do not share revenue with any individual or entity. We do not receive any compensation from Principal Trading. In general, we require a minimum of \$500,000 to establish a relationship with us. At our discretion, we reserve the right to waive this minimum.

For additional information, please refer to Items 4, 7, & 13 of our Form ADV Part 2A at the following link: <https://adviserinfo.sec.gov/firm/brochure/282509>.

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 investments to recommend to me?*
- ❖ *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3 – What fees will I pay?

We are primarily compensated by a percentage of assets under our management, hourly fees, and fixed fees. Our fees vary depending on the services you receive.

- Management fees are based on a percentage of your assets under our management, and are payable each quarter in arrears. Fees are negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of the client's financial circumstances, among others. We may negotiate our fee schedule to include flat or maximum fees. We generally require a minimum annual fee of \$4,000. The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account.
- For planning services, we charge a base fee of \$2,500. Planning fees are negotiable and may vary depending on the nature, complexity, and time involved in providing you with the requested services. Generally, we require a prepayment of \$1,000 with the remaining balance due upon completion of the agreed upon services.
- For consulting services, we charge an hourly fee of up to \$500 for consulting services. Consulting fees are negotiable

depending on the nature, complexity, and time involved in providing you with the requested services. Generally, we require a prepayment of 50% of the estimated fee with the remaining balance due upon completion of the agreed upon services.

Other Fees and Costs: The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by investment companies (e.g., mutual funds, exchange traded funds and unit investment trusts) in products we may use to invest your assets. These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. You will usually also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian that executes the trade. The broker-dealer or custodian may also charge your account for custodial fees, retirement account fees, trust fees, exchange fees, redemption fees that may be assessed on investment company shares, transfer fees, account termination fees or other special service fees and charges. We do not share in any portion of these fees imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our firm, and others.

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 regarding fees, please see Item 5 of our Form ADV Part 2A at the following link: <https://adviserinfo.sec.gov/firm/brochure/282509>.

Conversation Starter. 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 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:

- All investment advisers face conflicts of interest which are inherent in the business. Our source of compensation is through asset based fees and other fees our clients pay us. Therefore, we are incentivized to acquire new clients and to increase assets under management. Other conflicts of interest result from other business activities we engage in and relationships we have with business partners and third parties, or affiliations we have established with other financial institutions.

Conversation Starter. Ask your financial professional—

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

Please refer to our Form ADV Part 2A for further information on our conflicts of interest and how we address them at the following link: <https://adviserinfo.sec.gov/firm/brochure/282509>.

How do your financial professionals make money?

Our financial professionals receive compensation as a portion of the fee you pay us, a portion of our profitability and/or a salary. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account.

Item 4 – Do you or your financial professionals have legal or disciplinary history?

No, our firm and financial professionals do not have reportable legal and/or disciplinary history.

For a free, simple search tool to research us and our financial professionals please visit Investor.gov/CRS.

Conversation Starter. Ask your financial professional—

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

Item 5 – Additional Information

For additional information about our advisory services, please refer to our Form ADV Part 2A brochure available at <https://adviserinfo.sec.gov/firm/brochure/282509>, and the individual Form ADV Part 2B brochure supplement(s) attached to that brochure. If you have any questions, need up-to-date information and/or need a copy of this Client Relationship Summary, please contact us at (833) 666-1200 or online at www.redtortoisellc.com.

Conversation Starters. Ask your financial professional—

- ❖ *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?*