

CLIENT RELATIONSHIP SUMMARY - Form CRS

Stark Financial Advisers (“SFA”) is registered with the SEC as an investment adviser. There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

We are an investment adviser and provide advisory accounts and services rather than brokerage accounts and services. Brokerage and investment advisory services and fees differ. It is important for you, a *retail investor*, to understand the 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 advisers, and investing.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

Description of Services

- We offer investment advisory services (asset management) to *retail investors* (individuals, pension, and profit-sharing plans, corporations and other business entities).
- We will discuss with you your investment objectives, risk tolerance, investment horizon and liquidity needs. Based upon our discussions we will recommend a suitable investment strategy ranging from Very Conservative to Aggressive risk.
- We offer discretionary authority asset management (we buy and sell investments in your account without asking you in advance). The discretionary authority continues as long as your account remains open.
- We monitor your investments on an ongoing basis and rebalance your portfolio at least quarterly.
- We are an “asset allocation” manager. Your investments will be allocated to a variety of asset classes that may include fixed income securities (investment grade and high yield), domestic and international stocks (developed and emerging markets), real estate investment trusts, tangibles (gold, silver, energy and agricultural products) and cash or cash equivalents (money market funds).
- We have a minimum account requirement of \$100,000.00 for *retail investors* to open or maintain an account. However, this threshold may be reduced under certain circumstances.

Additional Information about our investment advisory services is available in our Form ADV, Part 2A Brochure.

Ask our financial professionals these key questions about our investment services and accounts:

- Given my financial situation, should I choose an investment advisory account? Why or why not?
- How do advisory accounts compare with typical brokerage accounts?
- How much would I pay per year for an advisory account? What would make those fees more or less? What services will I receive for those fees?
- Tell me how you and your firm make money in connection with my account?
- How will you choose investments for my account?
- What is your relevant experience, including your licenses, education, and other qualifications?
- What can you tell me about your legal obligations to me? If I have concerns about how you are treating me, who can I talk to?
- What is “wrap fee” pricing? What are the advantages and disadvantages? Which pricing method would be best for me?

FEES, COSTS, CONFLICTS, and STANDARD OF CONDUCT

What fees will I pay?

- We make money from management fees earned, and from dividends, interest and capital gains earned from proprietary trading.
- “Our fees are asset based”, vary, and are negotiable. The amount you pay will depend, on the services you receive and the amount of assets in your account. Please read Form ADV, Part 2A, Item 5 for additional information.
- Generally, the more assets you have in the advisory account, including cash, the more you will pay us. We do offer reduced fees as an incentive to increase the assets in your account.
- You pay our fee quarterly even if you do not buy or sell.
- You will pay fees and costs whether you make or lose money on your investments.
- You may also pay additional fees to a broker-dealer, or other financial institution, that will hold your assets (called “custody”).
- You can choose to pay management fees, and most brokerage, fees in one combined “wrap fee” arrangement.
- Investments in certain securities, such as traditional mutual funds, or exchange traded funds, may incur additional fees.

Standard of Conduct

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.

We must abide by certain laws and regulations in our interactions with you.

- We are held to a fiduciary standard that covers our entire investment advisory relationship with you.
- Our interest can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether to agree to them.

How do your financial professionals make money?

- Your financial professional, if registered only with SFA, is compensated solely from a percentage of management fees that you pay.
- If your financial professional is dually registered with a securities broker/dealer, he/she may also earn compensation from commissions and fees that you pay to the firm. This is a potential conflict of interest.

DISCIPLINARY HISTORY

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

- Disciplinary information is disclosed in our Form ADV (Item 11 of Part 1A).
- You can also find a firm’s, or individual’s, disciplinary history using the Security and Exchange Commission’s search tool. Please visit, investor.gov/CRS and select: “How do I find a firm’s or individual’s disciplinary history?”

ADDITIONAL INFORMATION

We encourage you to seek additional information on our advisory services.

- See our Form ADV brochure, on IAPD, at investor.gov, or on our website, starkadvisers.com.
- Form ADV and additional brochure supplements are also available by calling 561-243-3815 or 863-697-8024.
- To report a problem to the SEC visit: investor.gov or call the SEC’s toll-free investor assistance line at: (800) 732- 0330.
- If you have a problem with your investments, account, or financial professional, contact us in writing at: 16950 U.S. Highway 441 N, Okeechobee, FL 34972.