

Client Relationship Summary
Gleneagles Investment Advisors LLC
March 2023

Gleneagles Investment Advisors, LLC (“GIA,” “we,” or our “Firm”) is an investment adviser, registered with the U.S. Securities and Exchange Commission (“SEC”). GIA provides investment advisory and asset management services on a non-discretionary basis to clients. Brokerage and investment advisory services and fees differ, and it is important for the retail investor to understand the differences. GIA professionals provide advisory services on a variety of products with a variety of fee structures. It is important that you understand the differences between the types of products offered by GIA and associated fees and costs with those products. Form CRS is designed to provide you an easy to read overview of our services, conflicts associated with providing these services, and the cost to you. This Form CRS also provides you “Conversation Starters” or considerations you might want to discuss with your financial professional. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

GIA offers non-discretionary investment advisory services. We seek to meet each investor’s financial objectives through offering a customized investment portfolio that may include single stock portfolios, employee option strategies, options trading, or pooled investment vehicles such as investment companies, hedge funds, funds of funds and private equity funds, and the monitoring and evaluation of the performance of third-party money managers. Our client portfolios are reviewed on a regular basis to ensure that your investments are in line with your investment objectives. While there is no firm minimum asset size, we typically expect our clients to have a net worth of at least \$30 to \$50 million within a near term timeframe. For more information regarding all of our services, please see Item 4 and Item 7 in our ADV Brochure.

Conversation Starters:

- *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?*

What fees will I pay?

The fees we charge are outlined in the written agreement between you and GIA. The fees are based on the services provided, the amount of assets in the portfolio, and the type of account being managed. These fees are subject to negotiation under certain circumstances and at our sole discretion. Our advisory fee is billed monthly and is based on the closing balance for the month to which the fee relates (pro-rated if necessary, for partial months).

Other fees and costs you will pay directly or indirectly include charges imposed by unaffiliated third parties such as custodial fees, brokerage commissions, transaction fees, charges imposed directly by a mutual fund, fees imposed by variable annuity providers and disclosed in the annuity contract, certain deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees as outlined in fund prospectuses and offering memorandums. 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. Read more about our fees starting on Item 5 of the ADV Brochure (specifically, Items 5.A, B, C and D).

Conversation Starters:

- *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:

Proprietary products: Our employees are permitted to invest in the same securities as you. To mitigate this conflict, employees must receive pre-approval, trading is continually monitored, and all of our clients must receive full allocations for their desired investments in that security first.

Third party payments: We may receive an economic benefit from brokers in the form of the support products and services they make available to us and we recommend various broker-dealers or custodians for various products or custodial services. To mitigate these conflicts, we do not recommend brokers on a transaction basis, we receive no compensation or soft dollar benefits of any kind, and you can retain full discretion to accept or reject our investment recommendations and for implementing any accepted recommendations with any broker-dealer of your choice.

Conversation Starters:

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

Please refer to our ADV Brochure (specifically, Items 10, 11 and 12) for more information regarding conflicts of interest.

How do your financial professionals make money?

Our non-partner financial professionals receive a salary plus a bonus that is based on their personal performance. Financial professionals who are Partners at the Firm receive a draw, which is a guaranteed annual payment, plus a profit share based on their respective percentage of ownership in the Firm. Our financial professionals do not receive non-cash compensation. They are not compensated based on the amount of assets we manage for you, the types of products we recommend to you, or the advice we provide. Our financial professionals do not participate in any sales contests.

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

No. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters:

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

Additional information about our investment advisory services and a copy of Form CRS can be obtained by contacting us at 609-631-8231 and visiting us at www.gleneagleadv.com/. You can obtain a copy of our ADV Brochure and this Client Relationship Summary by visiting www.adviserinfo.sec.gov.

Conversation Starters:

- *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?*