

Cecchi Capital Advisers, LLC Client Relationship Summary

We are registered with the U.S. Securities and Exchange Commission as an Investment Adviser.

Investment advisory and brokerage 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.

What investment services and advice can you provide me?

We provide only investment management services. Our strategies are based on individually constructed domestic and foreign fixed income and equity portfolios that use statistical sampling to approximate the distribution of the world's liquid traded assets by value. Investment portfolios are constructed using proprietary statistical and mathematical models which attempt to maximize diversification and tax efficiency and minimize turnover, transaction costs and management expenses.

We manage accounts with full discretion regarding what is bought and sold and the quantity of each trade. Any limitations on our discretionary authority must be agreed to by us in an investment management agreement.

We monitor portfolio investments on an ongoing basis and generally manage each account to a target model portfolio. A client may impose restrictions upon what we may buy for the client's portfolio either at the inception of the relationship or by contacting Delia Mupita at her email address: dmupita@cecchicapital.com. Portfolios are normally rebalanced when significant model changes occur, with cash balances re-assessed on a bi-weekly basis.

The minimum separate account size is \$5,000,000. Accounts may be aggregated for determining the dollar value of assets. Waivers or exceptions from the minimum account requirement may be granted at our sole discretion.

Please refer to Items 4 and 7 of our full Firm Brochure for more information regarding our services. You may access our Firm Brochure at <https://adviserinfo.sec.gov/firm/summary/143478> and clicking the "Part 2 Brochures" button.

Given my financial situation, should I choose an investment advisory service? Why or why not?

You should hire an investment adviser if you believe that you need help in managing your investment portfolio and you have the liquid reserves necessary to accept investment risk. Our services are not suitable for everyone and are generally intended for high net worth investors.

How will you choose investments to recommend to me?

As discussed above, investments are purchased or sold based upon changes we make to our proprietary model portfolio, subject to account-level limitations imposed by you. Assets are invested mostly in fixed income and equity securities, utilizing exchange-traded funds, where appropriate, to seek maximum diversification. Some clients also choose to participate in our options overlay strategy in an attempt to manage interest rate exposure and generate incremental income, though this strategy comes with additional risks and is not suitable for all accounts.

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

All of our investment professional have bachelor's degrees and many hold advanced degrees in business, mathematics, computer science and other applicable fields. Each member of our investment team also has at least twelve years of investment management industry experience.

What fees will I pay?

The amount paid to CCA and your financial professional generally does not vary based on the type of investments selected on your behalf. The asset-based fee reduces the value of your account and will be generally deducted from your account. Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Fees are billed quarterly in arrears. Our fees vary and are negotiable. Generally, the more assets you have in the advisory account, the more you will pay in total fees. We therefore have an incentive to

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increase the assets in your account in order to increase our fees. You may also pay a transaction fee when we buy and sell an investment for you. You will also pay fees to a broker-dealer or bank that will hold your assets (called “custody”). You pay our advisory fee even if there were no transactions within the account. You may also pay fees and costs applicable to common categories such as custodian fees, account maintenance fees, fees related to mutual funds and variable annuities, and other transactional fees and product-level fees.

Conflict of interest disclosure: The more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your 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.

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.

Conflict of interest disclosure: Since we also manage accounts owned by principals of the firm and certain related family members, we have incentives to give those accounts preferential treatment in trading for them. We manage those conflicts by using a trade allocation approach which seeks to ensure fair treatment of client trades in terms of both pricing and timing. Please note though that because retail accounts trade using pre-selected brokerage platforms, we cannot negotiate price and execution on those trades.

Please refer to Item 5 of our full Firm Brochure for a complete discussion of our fees and expenses and Items 6, 10 and 12 for more details regarding our various conflicts of interest. You may access our Firm Brochure at <https://adviserinfo.sec.gov/firm/summary/143478> and clicking the “Part 2 Brochures” button.

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

Please refer to the “conflict of interest disclosure” provided above.

How do your financial professionals make money?

Employees are paid salaries and may receive additional annual bonuses. Compensation is based solely upon job function and relevant industry experience. Some employees may also receive compensation for new accounts obtained.

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

No. Please visit [Investor.gov/CRS](https://investor.gov/CRS) for free and simple search tool to research us and our financial professionals.

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?

For general inquiries please contact Adam Checchi at adam@checcicapital.com or by phone at (310) 432-0010. For complaints or other special concerns regarding your treatment by any of our financial professionals, please contact Delia Mupita, Chief Compliance Officer, at (310) 432-0010 or at dmupita@checcicapital.com.