



## FORM CRS- A SUMMARY OF YOUR ADVISORY RELATIONSHIP WITH EXPAND FINANCIAL, LLC.

OCTOBER 15, 2022

### ITEM 1 – INTRODUCTION

Expand Financial, LLC f/k/a BOA (“Expand”) is an investment advisor registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important that you 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 - RELATIONSHIPS AND SERVICES

#### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Expand offers personalized investment advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. Individuals associated with Expand will provide these investment advisory services. All of these individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of Expand. Such individuals are referred to as Investment Adviser Representatives (IARs).

Our business revolves mainly around company sponsored retirement plans and individual investment advisory services. This process begins with financial goal identification, risk tolerance review and continues with the selection of the appropriate account or qualified plan type and investment choices to try to fulfill those goals. Finally, ongoing monitoring, review and adjustments to the portfolios and plans are made according to client desires and input from Expand.

When engaged on a discretionary basis, you provide us the limited authority to buy, sell, trade and allocate investments within your account(s) consistent with your investment objectives. When you hire us on a non-discretionary basis, you make the ultimate decision regarding the purchase or sale of each investment and we will obtain your approval prior to executing any transactions in your account. We do not limit the scope of our investment advisory services to a limited group or type of investment. We do not have a minimum account size or investment amount.

#### QUESTIONS TO 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?

FOR MORE INFORMATION REFER TO OUR FIRM’S ADV PART 2A BROCHURE - ITEM 4, 7, 8, 13 & 16

### ITEM 3 - FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

#### WHAT FEES WILL I PAY?

Our firm charges a quarterly or monthly investment advisory fee based on the account values at the end of the quarter or month prior, as indicated on your executed Investment Management Agreement. The investment management fee is paid in arrears and includes investment management supervision, trade entry, and other account maintenance and/or service activities.

Our investment management fees are based on a percentage of the total account value. Our maximum annual investment advisory fee is 1.50%, billed in arrears on a quarterly or monthly basis. You pay this fee even if you don’t buy or sell investments. The more assets in your advisory account(s), the more you will pay in fees, and therefore, our firm has an incentive to encourage you to increase the assets in your account(s). Your custodian will charge transaction costs, custodial fees, redemption fees, retirement plan and administrative fees, or commissions. The mutual funds and/or ETFs held in your advisory account(s) will charge management fees and other expenses. Our other firm fees are billed as follows:

**Sub-Advisory Fees:** With sub-advisory accounts billed in advance; fees shall be calculated based on the quarter end value for the preceding quarter. For sub-advisory accounts billed in arrears, the fee will be based on the average of the end of the month assets for each month in the quarter. *Our maximum sub-advisory fee is 1.50%.*

**Consulting Fees:** Fees for consulting services are negotiated on an hourly basis ranging from \$200-\$500 based on the extent and complexity of the consulting project.

#### QUESTIONS TO 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?

FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 5

**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:

- **Soft Dollars:** Our recommended custodians may provide us with certain products and services at no cost that benefit us but do not benefit clients. This creates a conflict of interest as it gives us an incentive to have clients custody their assets at our recommended custodians.
- **Insurance Sales:** When you purchase insurance products through an Expand Advisor licensed to sell insurance, an affiliate and/or your Expand Advisor receives compensation related to that purchase. This additional compensation gives us and your Financial Professional an incentive to recommend insurance products. You are under no obligation to purchase insurance or other products through us or our Financial Professionals.

Our Firm utilizes promoters and pays (direct or non-direct) compensation to independent third parties for the referral of clients to our Firm.

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

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

FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 10, 11, 12, & 14

**HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

Our financial professionals are compensated based on the revenue our firm earns from our investment advisory fees. This compensation is based on the amount of assets they service, the amount of time spent, and the complexity required to meet the client's needs or revenue based on the recommendations provided by our Financial Professionals. Financial Professionals licensed to sell insurance also receive compensation in the form of commission when you purchase insurance products they recommend. It is important to review your financial professional's ADV Part 2B Brochure. While some of our Firm's Financial Professionals are engaged in outside business activities, we are required to disclose material outside business activities and any conflict it may pose to you. Our Firm supervises the business activities of our Financial Professionals through our compliance program. All Financial Professionals are required to follow a Code of Conduct to mitigate any conflicts to you.

FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 5, 10, 11, 12 & 14

**ITEM 4 - DISCIPLINARY HISTORY**

**DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?**

No. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- As a Financial Professional, do you have any disciplinary history? For what type of conduct?

FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 9

**ADDITIONAL INFORMATION**

For additional information about our investment advisory services visit the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's IARD number is: 152515. You may also contact us directly for up-to-date information and to request a copy of the relationship summary at: 720-387-8158.

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

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

## MATERIAL CHANGES SINCE LAST FILING

On February 28, 2022, the Firm updated Form CRS for annual amendment. No material changes to report.

On October 15, 2022, the Firm updated the Form CRS to reflect the use of “promoter” in response to the SEC’s new Marketing Rule implementation and the Firm updated the Form CRS Item 3 – Fees, Costs, Conflicts, and Standard of Conduct, to reflect EQIS partnership.