THURSTON SPRINGER

December 15, 2022

Customer Relationship Summary

Helping you make an informed decision

Form CRS

Item 1. Introduction

Thurston Springer Advisors ("Thurston Springer") is an SEC registered investment advisor. There is an important difference between brokerage and investment advisory services, their related fees, and how those fees may be applicable to you. Free and simple tools are available for you to use at <u>Investor.gov</u>, a website maintained by the SEC. This site can provide you with educational materials about investment advisors and investing.

Terms to know:

An investment advisor is generally any person or group that provides investment advice or conducts securities analysis in exchange for a fee.

A broker-dealer is a firm that acts as an intermediary between buyers and sellers of securities for which they will usually receive a commission.

Item 2. Relationships and Services

What investment services and advice can you provide me?

You will have an advisory relationship at Thurston Springer. In an advisory account, you pay a fee to receive financial advice tailored to your individual financial needs. Securities are bought and sold in your advisory account according to the advice we provide. Thurston Springer offers wrap and nonwrap advisory services.

Advisory Account

An asset-under-management fee-based Thurston Springer advisory relationship carries an ongoing duty to monitor your account, and Thurston Springer will perform a full review of your account at least annually. An asset-under- management fee-based Thurston Springer Advisor relationship grants discretionary authority to your advisor to buy and sell securities in your account as necessary, without being required to obtain your advance consent for any trade. In addition to advisory programs, we offer through third parties; we offer several Compass advisory portfolios that we manage ourselves. We believe the cost structure in Compass is low enough that it does not create any conflicts. Thurston Springer is not limited to any specific product. Minimum account size is \$25,000.00 but we can waive that minimum if we so choose. Please see our ADV part 2A for more details. <u>https://thurstonspringer.com/disclosures/</u>.

Questions you might wish to ask when considering our services:

- Given my financial situation, why should I choose an investment advisory service?
- 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. Fees, Costs, Conflicts and Standards of Conduct

What fees will I pay? - Advisory Fees

Advisors receive a percentage of your advisory fees as compensation. 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. A Thurston Springer advisory relationship charges fees based on one of the following methods:

- A percentage of assets under management.
- Hourly fees.
- Flat-rate fees.

Other Fees and Costs

We, or an affiliate will charge you additional fees, such as custodian fees, account maintenance fees, and account inactivity fees. Depending on your account, more transactions in your account can result in more fees we charge you.

Conversation corner Questions you might wish to ask when considering our services:

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

What are your legal obligations to me when acting as my investment advisor? How else does the firm make money and what conflicts of interest do you have?

Standard of Conduct

When we provide you with a recommendation as your investment advisor, 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 recommendations and investment advice, we provide you. Here are some examples to help you understand what this means.

Examples of Ways We Make Money and Conflicts of Interest

Thurston Springer Financial receives other fees from your account that create conflicts. Thurston Springer Financial receives an interest rebate on cash balances in accounts held at the clearing firm(s). This interest rebate creates an incentive to leave cash balances uninvested. Thurston Springer Financial receives a rebate on margin- interest charged to balances held at the clearing firm(s). This margin-interest rebate creates an incentive to recommend that you open a margin account. Thurston Springer Financial receives compensation on transactions net of the costs charged by the clearing firm(s). This creates an incentive to trade in your account more frequently. Please ask your Thurston Springer professional to detail all conflicts that influence how your account is managed.

Questions you might wish to ask when considering our services

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

How do your financial professionals make money?

Advisors receive a percentage of your advisory fees as compensation. Advisory fees are charged against your entire account, whether or not you purchase or sell a security. The more assets you have in your advisory account, the more advisory fees you will pay. Advisors may have an incentive to place you in an advisory account to generate advisory fees which could be more expensive than brokerage commissions. In certain circumstances, Thurston Springer can exempt holdings in an advisory account from being subject to advisory fees.

Item 4. Disciplinary History

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

No, Thurston Springer has no legal or disciplinary history. Yes, some of the financial professionals might have legal or disciplinary history. You have the ability to research the history of any firm, representative, or advisor at <u>Investor.gov</u>, a free and simple search. You can also visit <u>https://brokercheck.finra.org</u>.

Questions you might wish to ask when considering our services

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

Item 5. Additional Information

Where can I find additional information?

If you require additional information, or if you want to discuss your investing experience at Thurston Springer, please contact Karey Williams, Chief Compliance Officer, at 317.975.3798 or kwilliams@thurstonspringer.com.

Questions you might wish to ask when considering our services

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

References

Please also visit these resources for additional information:

www.Thurstonspringer.com www.investopedia.com/financial-term-dictionary-4769738 www.investor.gov www.finra.org www.brokercheck.finra.org