

Cruise Investment Advisors, Ltd. Form CRS

Item 1. Introduction Published 02/25/2022

Cruise Investment Advisors, Ltd. is registered with the Securities and Exchange Commission as an Investment Adviser and provides financial and investment advisory services through CFO Capital Management and Cruise Financial Organization.

Brokerage, investment and financial advisory services and fees differ, and it is important for you to understand the differences. The Securities Exchange Commission (SEC) offers free and simple tools to research firms and financial professionals at Investor.gov/CRS which also provides information tailored to educate retail investors about financial professionals and their financial planning and portfolio management services. It is also highly recommended that you review our website at www.cruisefinancial.com for more information about our services and advisory team.

Item 2. Relationships and Services “What investment services and advice can you provide me?”

Our firm offers the following two primary advisory services to retail investors: CFO Capital Management and Cruise Financial Organization [hereafter collectively referred to as “CFO”]. Our firm provides investment discretion for both the advisory services, which means that on an ongoing basis, and without requiring your pre-approval, CFO will buy and sell investments in your accounts according to an agreed-upon portfolio strategy unless you notify us in writing otherwise. There is a minimum investment per client of \$250,000. However, CFO will make exceptions to this policy, primarily for investment clients who engage CFO to manage multiple discretionary investment accounts [for family] with total assets over \$1million.

- Discretionary Portfolio management—Investment accounts are monitored and managed continuously by CFO.

Our CFO Capital Management Service accepts only discretionary accounts, managed on a fee-basis only through our designated custodian TD Ameritrade. Through Cruise Financial Organization, we also offer personal financial planning services for which we charge an agreed-upon, one-time fee to prepare a financial analysis or comprehensive plan as requested by a (prospective) client. Our financial planning services may be updated annually or as needed and requested by the client.

- Financial planning— Portfolio asset allocation strategies can be reviewed annually or at the specific request of the client but all non-discretionary brokerage accounts are serviced on a fee-only basis and are an exception to our standard CFO discretionary portfolio management services as described above.

For additional information including minimum investment amounts, please see <http://adviserinfo.sec.gov> for our Form ADV, 2A brochure (Items 4 and 7 of Part 2A or Items 4.A. and 5 of Part 2A Appendix 1).

Conversation starters. *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?*

Item 3. Fees, Costs, Conflicts and Standard of Conduct “What fees will I pay?”

Brokerage and custodial fees or costs are separate and distinct from the advisory fees charged by CFO. CFO does **not** share in these fees or costs. CFO can provide a list of those monthly, quarterly or annual fees/ costs that might be charged by the custodian. The portfolio management fees that are charged by CFO are fully disclosed in our Form ADV Part 1A, Item 5E and more fully described in our Form ADV Part 2A, Item 5. Management fees that might be considered to create a conflict of interest are described below and in more detail in our Firm's Part 2A:

- If CFO charges you asset-based fees, more assets in the account will result in you having to pay higher fees, and therefore we have an incentive to encourage you to increase the amount of money invested in those accounts. However, CFO is also very incented to make your portfolio investments grow, because that will result in more fees being paid to CFO and its advisors.

In addition to custodial fees/ costs and our CFO management fees outlined above, there are other fees and costs related to our investment advisory services and investments that you may pay directly or indirectly. Examples of the most common investment fees and costs are ETF and mutual fund fees and those fees charged by the managers of Alternative Investments

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such as non-tradeable REITs. Whenever possible for mutual fund investments made within our discretionary [fee] managed investment accounts, CFO will utilize institutional class shares that carry the lowest available expense ratios and without any 12b-1 expenses paid to CFO or our investment advisors.

Additional Information: 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 for any of our CFO portfolio management services. For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically Item 5) which can be found <http://adviserinfo.sec.gov>.

Conversation starters. 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?

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, it is our obligation to act in your best interest. We disclose how we are compensated for the financial service that we may recommend to you. That critical principle of our client relationships notwithstanding, the ways in which we can make money may create some conflicts with your interests. You should ask us about and understand those conflicts because they can affect the investment recommendations that we make to you. Here are some examples to help you understand what this means:

- As stated above, the more assets the client has in his/her account, the more we receive in fees. We therefore have an incentive to encourage a client to increase the amount of investment assets that we manage.
- Also, our minimum account size is negotiable at our discretion and under certain circumstances as previously stated. Should we agree to waive minimum account size or fees, we would receive less in fees for services provided. Therefore, we have a disincentive to wave our standard minimums for account size or account fees.

Additional information:

Conversation starters. Ask your financial professional:

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

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically Item 5) which can be found at <http://adviserinfo.sec.gov>.

How do your financial professionals make money?

- Our advisors are compensated based on the amount of assets they service, in the form of cash compensation, and therefore earn higher compensation for investing and managing more of your money.
- Our advisors are compensated based on meeting the financial and investment management needs of their clients, and the more complex those needs are, the more potential fees they can earn.
- Our advisors may also hold insurance licenses and can receive compensation from purchasing insurance on your behalf.

Item 4. Disciplinary History “Do you or your financial professionals have legal or disciplinary history?”

Our firm has no disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters. Ask your financial professional:

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

Item 5 Additional Information

You can find additional information about our services and request a copy of the relationship summary by visiting www.cruisefinancial.com; emailing Tim Tymniak at tim@cruisefinancial.com or calling us at (203) 221-0202.

Conversation starters. Ask your financial professional:

– 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?