
Item 1. Introduction

Evolution Wealth Advisors is an investment adviser registered with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ; therefore, 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://www.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?”

Description of Services and Monitoring: We provide investment advisory services to retail investors. Our services include portfolio management and non-discretionary consulting and consolidation services. For clients to whom we provide portfolio management services, we offer both fee plus transaction accounts and wrap fee accounts, both of which we monitor on an ongoing basis and rebalance at least annually. As part of our standard services, we review investments held in client accounts at least annually and meet with clients at least annually. Factors that trigger reviews include changes to our investment recommendations, changes in market conditions, and changes to your financial situation and/or investment needs. Our non-discretionary consulting services involve communicating our opinions on investment matters such as strategy, portfolio structure, asset allocation and/or risk analysis. Clients, at their discretion, may implement any of the recommendations by instructing their custodian directly. To provide all our clients with a global view of their assets, we provide consolidation services. Such services are typically provided at no additional cost. This service entails aggregating the client’s accounts that we supervise with their accounts maintained outside our firm, and with their other assets and investments. This global view assists in making informed recommendations and decisions.

Investment Authority: We offer our portfolio management and wrap fee accounts on both a **discretionary** and **non-discretionary** basis. Discretionary portfolio management allows us the limited authority to buy and sell investments in your account without asking you each time a transaction is placed. With non-discretionary portfolio management, we provide investment recommendations but require your approval to proceed. You make the ultimate decision regarding the purchase or sale of investments. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

Investment Offerings and Minimum Requirements: While we can advise on any investment asset, our investment recommendations are primarily related to investments in exchange traded funds, mutual funds, bonds, and private funds. As a condition for starting a portfolio management relationship, we generally require a minimum of \$1,000,000 in investable assets, which can be reached within the first twelve (12) months of entering into the investment management agreement. We may waive this minimum at our discretion. We do not require a minimum asset amount for non- discretionary consulting services.

Additional Information: For additional information, please see our [Form ADV Part 2A](#) and [Appendix 1](#) (with special emphasis on Items 4 and 7 of Part 2A or Items 4.A and 5 of Appendix 1).

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?

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

“What fees will I pay?”

Our fees are based on the types of services we provide.

- **Portfolio Management:** We charge an ongoing asset-based fee. The fee is calculated as a percentage of your assets that we manage. For wrap fee accounts, the fee is calculated and charged quarterly in advance or arrears. For non-wrap fee accounts, the fee is calculated monthly, but billed quarterly in arrears. 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. In the wrap-fee accounts, the ongoing asset-based fee will include most transaction costs and fees to the broker-dealer or bank that has custody of your assets. We do not increase our management fee to cover these additional costs.
- **Non-Discretionary Consulting:** We charge a flat (fixed) fee, or a fee computed on total market value of the portfolio, based on the services provided and account size. Fees are negotiable and payable monthly or quarterly in advance or in arrears based on the written agreement.
- **Private Funds:** When we recommend or invest client assets in alternative investments, we do not charge our typical portfolio management or consulting fee. Instead, we charge a fee that is initially calculated as a percentage of the value of the invested capital and subsequently calculated on the value of the investment as we obtain new valuations. The amount of the fee will depend on considerations such as the transaction’s complexity, the work we perform, the expected return, and third-party costs.

* Consider asking your financial professional these questions.

Other Fees and Costs: Some investments impose additional fees that will reduce the value of your investments over time. Those fees and costs may include mutual fund expenses, sales or surrender charges, or performance fees and carried interest charged by alternative investment managers. In addition, mutual funds and alternative investments also charge asset management fees that are in addition to our fees. You may also pay other fees to the custodian of your assets. These include, but are not limited to, brokerage commissions, transaction fees, margin interest, maintenance fees, other brokerage-related costs, SEC fees, and other fees or taxes required by law.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More detailed information about our fees and costs are included in our [Form ADV Part 2A](#) (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?”

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:

- Our custodian for retail investors provides certain platform services, without charge, for maintaining client assets with them. The receipt of such economic benefits by us creates a potential conflict of interest and may indirectly influence our choice of custodian for custody and brokerage services. To address these potential conflicts of interest, we have developed and implemented a Compliance Program, which includes a review of the services and execution quality we receive from the custodian we recommend.
- Clients who invest in private equity may be charged a performance fee by the fund manager. We may receive a portion of the performance fee from the private fund manager.

“How else does your firm make money and what conflicts of interest do you have?”

As noted above, we generate revenues from our portfolio management and consulting services, and we may receive a portion of the performance fee that is charged by the fund manager for private equity investments.

Conversation Starter *

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

These arrangements and additional information about conflicts of interest are discussed in more detail in our [Form ADV Part 2A](#).

“How do your financial professionals make money?”

Our IARs receive cash compensation in the form of a salary. Certain IARs also receive cash compensation based on the amount of assets they manage. Additionally, some beneficial owners of our Firm are passive investor/owners in an offshore broker/dealer. We have entered into agreements with the offshore broker/dealer whereby (1) we compensate the broker/dealer for research services, and (2) we pay a referral fee to the broker/dealer for referring clients to us. Each arrangement presents potential conflicts of interest. We strive to mitigate these potential conflicts through policies and procedures designed to ensure all clients are treated fairly. These arrangements and additional information about conflicts of interest are discussed in more detail in our [Form ADV Part 2A](#).

Item 4. Disciplinary History

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

No for our firm. Yes for one of our financial professionals. We invite you to visit Investor.gov/CRS for a free and simple search tool to research our Firm and financial professionals.

Conversation Starters *

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

Item 5. Additional Information

We encourage you to seek additional information about our investment advisory services in our [Form ADV Brochure](#) on Investor.gov or adviserinfo.sec.gov. Alternatively, you can call Evolution Wealth Advisors at (305) 921-4740 to speak with us directly and request a copy of this relationship summary or email us at lroditi@ewadvisors.net.

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?

* Consider asking your financial professional these questions.