

Holistic Brokerage, LLC (the “Firm,” “HBUS,” “we” or “our”) is registered with the U.S. Securities and Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). The Firm is affiliated with Holistic Asset Management LLC, a state registered investment advisor with the Florida Office of Financial Regulations (OFR). Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences.

Free and simple tools are available to research different 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?

Holistic offers brokerage services and introduces these accounts (cash and margin) to Pershing, LLC, the Firm’s clearing firm for execution and processing of securities orders. Our brokerage services include the buying and selling of securities and investment products which include but not limited to stocks, bonds, mutual funds, options, structured products, exchange traded funds or ETFs, and other instruments to retail and non-retail customers.

We may recommend investments and services, but the ultimate decision regarding a service, investment strategy or the purchase or sale of an investment will be yours. Although we do not provide ongoing monitoring of your account, we will review your account before every recommendation to consider your risk tolerance and investment objectives at the point in time we provided them to you. We have an obligation to ensure our recommendation is in your best interest. We will provide you with account statements on a quarterly or monthly basis. The Firm generally requires a minimum account value of \$250,000 although lesser value accounts are permitted on a case-by- case basis. Additionally, some investment options may require a minimum investment.

The Firm does not provide investment advisory services.

### Terms to know.

- 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 and may purchase or sell those securities in/out of their own account.
- An investment adviser is generally any person or group that provides investment advice or conducts securities analysis in exchange for a fee.

ASK YOUR FINANCIAL PROFESSIONAL:	<ul style="list-style-type: none"><li>• Given my financial situation, should I choose a brokerage service? Why or why not?</li><li>• How will you choose investments to recommend to me?</li><li>• What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</li></ul>
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## WHAT FEES WILL I PAY?

When you transact in a brokerage account, you will generally pay a transaction-based fee – more transactions result in higher fees and overall cost. The fee is based on the specific transaction, not the value of your account. With stocks or exchange-traded funds this fee is called a commission. For other investments, such as a bond, this fee might be part of the price you pay for the investment, which is also known as “mark-up” or “mark-down.” With mutual funds and certain other products this fee is usually referred to as a “sales charge” or “sales load” and reduces the value of your investment. From a cost perspective, you may prefer a transaction- based fee if you do not trade often or if you plan to buy and hold investments for longer periods of time. The Firm also assesses annual account maintenance fees and wire fees amongst other administrative fees. For a complete list of fees, you will incur, please ask your account executive to provide you with our schedule of fees. Additionally, our custodian will charge custodian fees, settlement fees, document delivery fees, asset management fees (Corestone), product level fees, confirmation and statement production, paper surcharge, and other fees. Not all fees will apply to you as a client and other firms could offer brokerage services at lower costs.

**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. Please make sure you understand what fees and costs you are paying prior to investing.**

We must act in your best interest and not place our interests ahead of yours, but you will be charged more when there are more trades in your account, therefore the firm and your account executive have an incentive to encourage you to transact on a frequent basis. This is a conflict of interest which we mitigate via additional disclosures as well as the Firm’s supervision and compliance program which monitors customer account activity and fees/commissions on a periodic basis.

ASK YOUR FINANCIAL PROFESSIONAL:	<ul style="list-style-type: none"><li>• 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?</li></ul>
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## WHAT ARE YOUR OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we provide you with a recommendation, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we generate revenue and the manner in which your financial professional is compensated creates some conflicts with your interest. While we have taken



numerous steps to mitigate and eliminate conflicts of interest, it is also important that we disclose the material facts and the impact associated with these conflicts. Here are some examples to help you understand common conflicts of interest associated with the Firm and your financial professional:

- Revenue sharing, such as when we or our affiliates receive selling group compensation.
- Trail Compensation is ongoing compensation from product sponsors typically paid from the assets of an investment product based on an annual percentage of invested assets and varies by product. We therefore have an incentive to recommend products that pay higher “trails.”

ASK YOUR FINANCIAL PROFESSIONAL:

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

## HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Your financial professional is paid a percentage of the income generated by your investments (commissions, markups, markdowns, sales charges/loads, trailers, 12b-1 fees – as described above). They may also receive additional compensation such as reimbursement for certain expenses, non-cash compensation such as travel, or an increased payout based on higher production. This represents a conflict of interest since the more commissions they generate the more they earn. Our representatives do not receive varying compensation based on the type of products they sell although certain products pay ongoing compensation (trailers); therefore, financial professionals are incentivized to recommend products that have higher fees and/or ongoing payments.

### Examples of Ways We Make Money and Conflicts of Interest:

Some of our Registered Representatives are dually registered which creates a Conflict of Interest depending on the type of account that they recommend and compensation structure. We make money by selling certain investments, such as mutual funds that pay 12B-1 fees or marketing fees in brokerage accounts. We do not sell any proprietary products at this time. Please find outlined below further details related to the way we make money and applicable conflicts of interests:

- **Principal Trading.** From time-to-time, we will buy or sell a security directly from or to clients, this may happen when a client is holding a fixed income security that does not meet the minimum quantity to be sold in the open market and it is then sold internally to another brokerage client, or we can improve the price by taking the mid-market price between bid and ask prices, and afford a better price to the client.
- **Third-Party Payments.** We and financial professionals receive compensation from investment product sponsors and other third parties in connection with investments that our customers make in securities such as mutual funds, money market funds and alternative investments. Some types of third-party compensation received by us may or may not be shared with financial professionals, and other types are retained only by us. For more information about the third-party compensation we receive, the investment product sponsors and other third parties that pay us the compensation, and related conflicts of interest, please see the Third-Party Compensation and Related Conflicts of Interest on Regulation Best Interest Disclosures.
- **Revenue Sharing.** We offer customers the ability to purchase securities on credit, also known as margin purchases and short selling securities. When a customer purchases securities on margin, our custodian extends a line of credit to the customer and charges interest on the margin balance which in turn may be shared with us. We may have a financial incentive to encourage margin borrowing if we were to earn compensation in the form of interest, transaction charges, and other fees on investments made with borrowed amounts. These financial incentives create a conflict of interest insofar as we benefit from your decision to borrow and incur the various fees and interest described above. If contemplating use of margin, please consult the Pershing Agreement and related disclosures for additional details.

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

Yes. To access this information, you can visit [brokercheck.finra.org](https://brokercheck.finra.org) or [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research more information about our Firm and your financial professional.

ASK YOUR FINANCIAL PROFESSIONAL:

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

## ADDITIONAL INFORMATION

You may find additional information about our firm and services at [hb-us.com](https://hb-us.com) or you may direct your inquiries to our e-mail: [info@hb-us.com](mailto:info@hb-us.com). For additional information about our brokerage services, visit [brokercheck.finra.org](https://brokercheck.finra.org)

ASK YOUR FINANCIAL PROFESSIONAL:

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

If you have any concerns about your representative or how he or she are treating you, please contact our Chief Compliance Officer by email to [compliance@hb-us.com](mailto:compliance@hb-us.com) or via phone at (305) 374-1177.