

# Customer Relationship Summary – Form ADV Part 3

## Constantine Barry Asset Management (CBAM)

### Introduction

Constantine Barry Asset Management (CBAM) is registered with the Securities and Exchange Commission (SEC) as a Registered Investment Advisor, founded in 2008 with offices in New York City, New York. Brokerage and investment advisory fees differ. It is important for you to understand these differences.

Free and simple tools are available to research firms and professionals at [Investor.gov/CRS](http://Investor.gov/CRS) which also provides educational materials about broker dealers, investment advisors and investing.

CBAM offers investment advice based on the individual needs of its respective clients, inclusive of wealth management, investment consulting, portfolio management, asset allocation and cash management. We offer these services on a Discretionary and Non-Discretionary basis for all clients and monitor all investments and services on a regular basis. Discretionary advisory services mean that CBAM can have the ability to purchase and sell securities without first requiring your permission. Non-Discretionary advisory services mean that you (the client) make the ultimate decision regarding the purchase and sale of investments. CBAM also serves as a sub-advisor to an asset management program at an international custodian.

CBAM was formed and structured to provide independent, unbiased investment advice to its clients. Our entire focus is on serving private individuals and families. We have a boutique, bespoke approach serving each client based on their unique specific need, supported by a referral-based client acquisition policy. Our relationship with our clients prioritizes a framework of security, accessibility and transparency through the focus on leading, high quality investments. We do not provide custody but have the capability to coordinate relationships with various independent custodians in addition to our primary custodian. We also provide flexibility to work with the client's custodian of choice. You can find more information about our services on our form ADV, Part 2A Brochure.

*Conversation starters:*

*Why should I use an investment advisor?*

*How will you choose the investments to recommend to me?*

*What is your relevant experience, including licenses, education and other experience?*

### What fees will I pay?

We are generally compensated based on a management fee which is calculated based on a percentage of assets under management or a flat rate for consulting services. Fees are deducted in advance on a quarterly basis. For qualified investors, a performance-based fee is applied and calculated based on clear and pre-determined parameters including the requirement for account performance to exceed a hurdle rate. You will also be charged for services provided by the custodian (independent from CBAM) which we do not receive. These costs can include custodial fees, transaction costs and account and maintenance fees administered by the independent custodian. 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. You can find more information about our services on our form ADV, Part 2A Brochure.

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

When we act as your investment adviser, we must 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.

We have formal arrangements with 3<sup>rd</sup> party referrers who introduce clients to CBAM. This may incentivize CBAM to recommend certain custodians in favor of others whereby we are not obligated to pay a portion of our fees to said custodians. Clients should be aware that a performance-based fee arrangement may create an incentive for us to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement.

You can find more information about our services and conflicts on our form ADV, Part 2A Brochure.

*Conversation starters:*

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

## **How do your financial professionals make money?**

In addition to a base salary, our financial professionals are compensated based on a non-discretionary bonus formula which considers their individual performance in conjunction with overall revenue of firm. As sole managing member, Constantine Barry is compensated based on the overall profitability of the firm. You can find more information about our services in our form ADV, Part 2A Brochure.

*Conversation starters:*

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

*NO*

Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

*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?*

You can visit [www.cbaminvestments.com](http://www.cbaminvestments.com) to find additional information about our investment advisory services and request a copy of our relationship summary.