

# Cohen Klingenstein LLC

## Client Relationship Summary (Form CRS/ADV Part 3) September 13, 2021

### Item 1. Introduction

Cohen Klingenstein LLC (“We” or “Our”) is registered with the Securities and Exchange Commission as an investment advisor. Investment advisory services and fees differ from those of a broker-dealer, and it is important for you to understand the differences. Form CRS summarizes the services and fees offered to “retail investors,” defined by the Securities and Exchange Commission as natural persons or their legal representatives, who seek or receive services primarily for personal, family or household purposes. Free and simple tools are available to research firms and financial professionals at [investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers and investing.

### Item 2. Relationships and Services

#### What investment services and advice can you provide me?

We provide investment advisory services to retail investors, principally investment advice, and when appropriate or requested, financial planning and non-investment wealth planning services.

Our ADV Part 2A Brochure Item 4 – Advisory Business [Form ADV](#) thoroughly describes the services provided to our clients. However, in summary, we offer investment advice based on individual investment objectives, risk tolerance and constraints, time horizons and liquidity needs. Investment advice is principally regarding equities and fixed income securities, through investments in individual securities, mutual funds, or exchange traded funds. Our strategy is focused on tax treatment of client activity which could influence our decision-making process and could affect our return performance. As a general practice, we do not seek to outperform the market through stock selection. We believe that superior long-term returns can best be delivered through a broadly diversified portfolio that tracks relevant indices, coupled with reduced expenses and maximum tax efficiency. There can be no assurance that we will achieve this objective while in comparison we may underperform other more active portfolio managers.

The portfolio manager(s) reviews the portfolios on at least a monthly basis. Our support team monitors trading and money movement activity for accuracy and completeness.

Advice is generally provided on a discretionary basis, pursuant to a discretionary investment advisory agreement, which allows us to buy and sell securities for a client account without seeking approval from the client on a trade-by-trade basis. Discretion can be limited by the client by imposition of reasonable restrictions.

While business is typically with “substantial” accounts, there is no specified minimum account size.

**For additional information**, please see our [Form ADV](#) Part 2A Brochure Item 4 – Advisory Business.

*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?

As thoroughly explained in ADV Part 2A Brochure Item 5 – Fees and Compensation [Form ADV](#), we are compensated through a negotiated annual advisory fee typically based on the size of Assets Under Management (“AUM”) for the account. If an investor has multiple accounts being managed by us, the aggregate AUM of the accounts could be taken into consideration when negotiating the advisory fee. The advisory fee is applied to the fair market value of assets and paid quarterly in arrears. The advisory fees paid to us are exclusive of transactional costs which are paid by clients. These expenses include, but are not limited to, brokerage commissions; transaction fees; fees charged by mutual funds; custodial fees; transfer taxes; etc. These expenses are further described in [Form ADV](#) Part 2A Brochure Item 5 and in [Form ADV](#) Part 2A Brochure Item 12 – Brokerage Practices. The more assets in your account, the more you will pay in fees, and we have an incentive to encourage you to increase the assets in your account.

Example Advisory Fee Schedule – Annual Fee

- 1.00% First \$2 Million of Assets
- 0.75 % Next \$8 Million
- 0.50 % Next \$40 Million
- 0.40 % Balance above \$50 Million

***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.***

*Ask your financial professional -*

Help me understand how these fees and costs might affect my investments. If I give you \$1,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?

### **Conflicts and Standard of Conduct:**

#### **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 have to act in your best interest and not put our interest ahead of yours. At the same time, the way investment advisers make money creates some conflicts with clients' interests. You should understand and ask about these conflicts because they can affect the investment advice provided to you. Here are some examples to help you understand what this means. Investment Advisors can have several sources of income and these can cause conflicts of interest. Our sole source of income, however, is management fees paid directly from clients to us. The Manager, its principals and affiliates are not prohibited from participating in other business ventures, including serving in similar capacities for other investment accounts or other investment or investment management companies, such as, without limitation, other private investment funds or on boards of directors of other companies. Such activities will prevent them from devoting full time to the activities of any one account or the fund we manage and require us to refrain from trading certain securities. This may result in potential or actual conflicts of interest in allocating time and resources between services or functions for an account or the fund and such other business ventures. The Manager and affiliates are not prohibited from participating in the formation and operation of other investment funds, which may be in direct competition with an account or the fund. Such current and possible future business activities of the Manager and its affiliates may result in potential or actual conflicts of interest.

There may also be conflicts associated with differential treatment of clients or between separately managed accounts and the fund we manage. We may vary from a pro rata allocation and use different allocation where we determine that it is advisable to do so, taking into account concentration of holdings, investment objectives and guidelines and available cash in allocating such investment opportunity among the fund and other accounts. Using a non pro rata allocation method may result in a perceived conflict of interest between the fund and other accounts, as applicable. We will act in a manner, which we consider fair and equitable, in allocating investment opportunities among the fund and the other accounts.

**For additional information,** please see our [Form ADV](#) Part 2A Brochure Items 5, 8 and 10.

*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?**

Our financial professionals receive a salary and a discretionary bonus, based on the firm's overall financial condition and profitability.

### **Item 4. Disciplinary History**

There is no disciplinary history with any of our principals. However, our firm was required to pay a monetary civil penalty for failing to submit a regulatory filing in a timely manner. Please see our [Form ADV](#) Part 2A Brochure Item 9 – Disciplinary Information. If you want to do your own disciplinary research on your financial professionals, we suggest you visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool.

*Ask your financial professional –*

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

### **Item 5. Additional Information**

For additional information about Cohen Klingenstein LLC or to request a copy of our relationship summary, please contact us by email at [ckllc@cohenklingenstein.com](mailto:ckllc@cohenklingenstein.com) or by phone at (212) 757-0235.

*Ask your financial professional –*

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

## Exhibit A: Highlight Summary of Material Changes

Described below is a brief overview of the changes made to the Form CRS submitted on September 13, 2021.

### **Item 3 Fees, Costs, Conflicts and Standard of Conduct**

Cohen Klingenstein LLC personnel may serve on boards of directors of other companies, including public companies, which may require us to restrict trading in those issuer securities and other related issuers due to exposure to potential material non-public information.