

INTRODUCTION

Clear Haven Capital Management, LLC (“we,” “us,” or “our”) is registered with the Securities and Exchange Commission as an investment adviser.

Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

We offer discretionary and non-discretionary investment advisory services to clients, including retail investors. Specifically, we provide portfolio management services to high net worth individuals through managed accounts. We invest in several different asset classes to achieve our investment goals, including, but not limited to, mortgage-backed securities, asset-backed securities and other fixed-income securities. We will construct an Investment Policy Statement (“IPS”) for your account, which documents your current financial situation, investment objectives, suitability, restrictions imposed, allowable investments, risk tolerance, liquidity needs and investment time horizon. Your portfolio is structured based on the objectives outlined in the IPS. You may have the ability to impose restrictions on the types of investments made for your account and/or our management style. Any restrictions imposed by you will be documented in your IPS. If we manage your assets on a non-discretionary basis, you will make the ultimate decision regarding the purchase or sale of your investments. Our principals regularly review portfolio holdings to determine that the securities (and other financial instruments) held in your account remain consistent with your investment objectives and guidelines. There is no minimum account size.

Additional information about our advisory services is located in Items 4, 8 and 13 of our [Firm Brochure](#).

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?*

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay?

We generally charge management fees, which are based on a percentage of your assets under management. Management fees are generally paid quarterly, in arrears, and are prorated for all partial billing cycles. We also charge performance fees on an annual basis, which are based on the net capital appreciation of your account.

These fee arrangements present certain conflicts of interest. For instance, the more assets you have in your account, the more you will pay us in management fees. We therefore have an incentive to encourage you to increase the assets in your account in order to increase our fees. Further, performance-based fees create an incentive for us to recommend riskier or more speculative investments. Additional conflicts pertaining to our fee arrangements are described below.

You can also incur custodial fees, pricing fees (if your account is subject to management fees), transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian executing your transactions. Certain accounts may also be subject to pricing and settlement fees, market data fees, order cancellation fees, and legal expenses. Additionally, we may allocate a portion of your capital to money market funds or exchange-traded funds. In addition to the fees and

expenses discussed above, you will indirectly incur similar fees and expenses if we invest your capital in such funds, as these funds in turn pay similar fees and expenses to their managers and other service providers.

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.

Additional information about our fees is located in Items 5 and 6 of our [Firm Brochure](#).

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, 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 that means.

- Because our management fees and performance-based fees are generally based on an account's net asset value, we have a conflict of interest in valuing account assets. To mitigate this conflict, we follow documented valuation policies.
- Performance-based compensation arrangements create an incentive for us to favor accounts with higher performance-based compensation rates over other accounts when allocating investments. To mitigate this conflict, we follow procedures that are designed to ensure that all clients are treated fairly and equitably, and to prevent this conflict from influencing the allocation of investments among them.

Conversation Starters. Ask your financial professional...

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

Additional information about our conflicts of interest is located in Items 6, 10, 11 and 12 of our [Firm Brochure](#).

How do your financial professionals make money?

Our financial professionals are paid a base salary and a discretionary bonus that is generally based on the performance of our client accounts. In addition, certain financial professionals are also eligible to receive a percentage of the performance-based compensation paid by our clients. Performance-based compensation is subject to the conflict of interest described above.

DISCIPLINARY HISTORY

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

No. Please visit Investor.gov/CRS for a free and simple search tool to research us 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?*

ADDITIONAL INFORMATION

You can find additional information about our advisory services in our current [Form ADV filing](#) or by e-mailing us at adamyoung@clearhavencm.com. For up-to-date information about us or to request an updated copy of this relationship summary, please contact us at (203) 240-1058.

Conversation Starters. 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 with how this person is treating me?*