

**Loyola Asset Management, LLC**  
**Form ADV Part 3 – CRS (Customer Relationship Summary)**  
September 1, 2023

**Item 1: Introduction**

Loyola Asset Management, LLC (“we” or “Loyola”) is a registered with the Securities and Exchange Commission (“SEC”). Registration of an investment advisor does not imply any specific level of skill or training. We provide investment advisory services to retail clients. Investment advisory services and fees differ from brokerage accounts and services, and it is important for you to understand these differences. This document is a summary of the services and fees we offer to “retail” investors and how you pay for them. It is important for you to understand the difference in fees and services between brokerage firms and investment advisers. 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?** We offer investment advisory services to retail clients through discretionary and non-discretionary programs in accordance with your investment objectives pursuant to our Investment Advisory Agreement. In a discretionary arrangement, we have discretion over the selection and amount of securities to be bought or sold in client account(s), subject to specified investment objectives, guidelines, or limitations set forth by each client. In a non-discretionary account arrangement, you make the ultimate decision regarding the purchase or sale of investments recommended by us. We offer financial planning services which may include but are not limited to investment planning, life insurance; cash flow analysis, financial modeling, opinion of value, tax concerns; retirement planning; college planning; and debt/credit planning. Our investment advisory activities focus on investments in various kinds of assets and securities in a variety of markets that are intended to fit within your objectives, strategies and risk profile as described by you. We work with you to identify your investment goals and objectives, as well as risk tolerance, in order to create a portfolio allocation strategy designed to complement your financial situation and personal circumstances. We monitor client accounts on an ongoing basis to ensure the performance and investment strategy remains aligned with your stated investment goals and objectives. We ordinarily require each account to have a minimum of \$100,000, although smaller amounts may be accepted and maintained at our discretion. We also serve as investment adviser to a private Fund. The Fund is incorporated offshore and structured as open-end investment company. For additional information, please refer to Items 4 and 7 of our Form ADV, Part 2A Brochure available at the SEC’s website, [www.adviserinfo.sec.gov](https://www.adviserinfo.sec.gov), or by contacting us.

**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?

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

**What fees will I pay?** We receive compensation as established in your written agreement with us. Generally, and pursuant to our Investment Advisory Agreement, fees for the management of accounts will be on a tiered basis based upon a percentage of the total assets in the account and range from to 1% to 2% of assets under management. The fee for creating client financial plans is between 0.25% and 3.00% of assets or an hourly fee between \$150 and \$500 depending upon the complexity of the situation and your needs. Additionally, you will incur certain fees and charges imposed by custodians, brokers, third party investment advisers and other third parties such as custodial fees, transaction fees, brokerage commissions, management fees charged by third party managers, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. You will pay fees and costs whether you make or lose money on your investments. Fees and costs are deducted from your account and 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. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. For additional information about fees and costs, please refer to the Form ADV, Part 2A Brochure Item 5.

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

As your investment adviser, we have to act in your best interest and not put our interest ahead of yours. We must eliminate conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them. At the same time, the way we make money creates some conflicts with your interests. Any conflicts of interest related to recommendations of other professionals will be disclosed to you in the event they should occur. You should understand and ask us about conflicts because they may affect the investment advice, we provide you. Here are some examples to help you understand what they mean:

- We charge an investment advisory fee based on the assets we advise on and level of services we provide.
- We are investment managers to a Fund and are compensated as their investment adviser. This arrangement represents a conflict of interest since it provides a different economic incentive for us to recommend investments in the Fund. Fees to Fund investors are disclosed in the Fund's offering documents and Private Placement Memorandum.

Please also refer to Item 10 of our Form ADV Part 2A Items 6, 10, 11, 12, 14 for additional information regarding the Fund and related conflicts. We do not charge performance-based fees, or offer proprietary products, or engage in principal trading, or have "soft dollar," or revenue sharing arrangements. You should understand and ask us about any conflicts because they affect the recommendations, we provide you. Please also refer to our Form ADV Part 2A Items 6, 10, 11, 12, 14 for additional information regarding actual or perceived conflicts.

**How do your financial professionals make money?** Neither we nor any of our supervised persons (employees) receive compensation for the sale of securities or other investment products. Our financial professionals are solely compensated on a salary basis.

**Item 4: Disciplinary History**

**Do you or your financial professionals have legal or disciplinary history?** No. There are no legal, regulatory, or disciplinary events involving our firm or any of our financial professionals. Visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple research tool to research us and our financial professionals. Also refer to the Form ADV Part 2B Brochure Supplement for additional information regarding our financial professional's experience, qualifications, and details of any disciplinary history.

**Ask your financial professional:**

- Do you have any disciplinary history? For what type of conduct?

**Item 5: Additional Information**

For additional information on our investment advisory services, see our Form ADV or for any questions or concerns, please contact Alvaro Castillo, President, and Chief Compliance Officer at [info@loyola-asset.com](mailto:info@loyola-asset.com), or by calling (305) 377-1941.

**Ask your financial professional:**

- Who is the primary contact person for my account?
- Is he/she a representative of an investment advisor or broker-dealer?
- If I have concerns about how this person is treating me, who can I talk to?

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**Amended Form CRS (Client Relationship Summary)**

**Summary of Material Changes**

We updated the Client Relationship Summary (Form ADV Part 3) to include an additional challenge question in the SEC guidance.

You can find additional information about our investment advisory services by visiting [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), or by visiting our website. You can also request up to date information, a copy of our client Relationship Summary, or inquire as to the change by contacting us at [info@loyola-asset.com](mailto:info@loyola-asset.com), or by calling (305) 377-1941.