

Pushkin Advisory Group, LLC

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Form ADV Part 3 – Client Relationship Summary

Date: 01/17/2024

Pushkin Advisory Group, LLC (referred to as “we” or “us”) is registered with the U.S. Securities and Exchange Commission (SEC) as an investment adviser. I feel that it is important for you, the *retail investor*, to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools 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.

What investment services and advice can you provide me?

I offer portfolio management services. As part of our standard services, we provide continuous monitoring of client accounts. When managing your portfolio, I generally provide advice on individual equities, bonds, ETFs and cash/CDs. I limit the types of investments since not every type of investment vehicle is needed to create an appropriate portfolio.

- I will manage your portfolio on a discretionary basis, which means I will buy and sell investments in your account without asking for your approval of the transaction in advance. You may limit my discretion, such as imposing reasonable restrictions on investing in certain securities or industry sectors.

► QUESTIONS TO ASK US:

- *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?*

What fees will I pay?

For Portfolio Management, I require a minimum investment of \$25,000. I reserve the right to make exceptions to this minimum. The fee is charged monthly in arrears. You pay this fee even if you don't buy or sell investments.

Fee Schedule:

- On Assets Under Management from \$0 to \$1M – 0.50% to 1.0% per annum
- On Assets Under Management from \$1M to \$5M – 0.5% to 0.65% per annum
- On Assets Under Management of \$5M and above – 0.4% to 0.5% per annum

Other Fees and Costs

Depending on the type of account and/or type of investment purchased, you may pay a transaction fee when we buy and sell an investment for you and you may also pay fees to a broker-dealer or bank that will hold your assets). In addition to the quarterly fee, you may also incur charges for management and operating expenses of mutual funds and ETFs, wire transfer fees, and interest charges on margin loans or securities backed lines of credit. We do not receive any portion of these fees.

<p>Additional Information</p> <p>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.</p> <p>More detailed information about our fees and the costs your account may incur can be found in our Part 2 Brochure. If viewing a paper version of this form, please visit https://adviserinfo.sec.gov/firm/summary/226674 for a link to this document.</p>	<p>► QUESTION TO ASK US:</p> <ul style="list-style-type: none"> <i>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?</i>
<p>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?</p>	
<p>When I act as your investment adviser, I have to act in your best interest and not put my interest ahead of yours. At the same time, the way I make money creates some conflicts with your interests. You should understand and ask me about these conflicts because they can affect the investment advice I provide you. Here are some examples to help you understand what this means:</p> <ol style="list-style-type: none"> 1. The more assets you have in your advisory account, the more you will pay me and thus I have an incentive to increase those assets in order to increase my fee. 2. If I recommend that you roll over your retirement plan assets into an account to be managed by me, I will earn an advisory fee on the rolled over assets. 3. The minimum investment size is negotiable under certain circumstances and at my discretion. Should I agree to waive this minimum, I would receive less compensation for services provided. I, therefore, have a disincentive to waive this minimum. 	<p>► QUESTION TO ASK US:</p> <ul style="list-style-type: none"> <i>How might your conflicts of interest affect me, and how will you address them?</i> <p>More detailed information about our conflicts of interest can be found in our Part 2 Brochure. If viewing a paper version of this form, please visit https://adviserinfo.sec.gov/firm/summary/226674 for a link to this document.</p>
<p>How do your financial professionals make money?</p>	
<p>As an independent firm and being the sole owner, my income is directly correlated to the firm's net income. As an investment adviser, I am legally required to act in your best interest and do not put my interests ahead of your own. I have systems in place to mitigate conflicts of interest, including systems to review whether a recommendation is in your best interest. Pushkin Advisory Group, LLC is an independent fee-based investment adviser. The firm is not a broker-dealer, and I am not a registered representative of a broker-dealer. Therefore, I do not provide brokerage services and do not receive any commissions or compensation from any investment product vendors.</p>	
<p>Do you or your financial professionals have legal or disciplinary history?</p>	
<p>No. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.</p>	<p>► QUESTION TO ASK US:</p> <ul style="list-style-type: none"> <i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i>
<p>Additional Information</p>	
<p>For additional information on Pushkin Advisory Group, LLC's advisory services, you may access the Part 2 Brochure. If viewing a paper version of this form, please visit https://adviserinfo.sec.gov/firm/summary/226674 for a link to this document. If you have any questions, need additional information or want another copy of this Client Relationship Summary, you may contact me at (315) 269-2828.</p>	<p>► QUESTION TO ASK US:</p> <ul style="list-style-type: none"> <i>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?</i>