



FIRM BROCHURE – FORM ADV PART 3

This brochure provides information about client relationship summary of Christmas Corporation. If you have any questions about the contents of this brochure, please contact us at +1 424 645 5003 or by email at: ivana@christmascorp.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Christmas Corporation is also available on the SEC's website at www.adviserinfo.sec.gov.

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CRD number : 282245

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Registration does not imply a certain level of skill or training.

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■ **ITEM I:
INTRODUCTION**

Christmas Corporation is registered with the Securities and Exchange Commission (SEC) as an investment adviser. This document gives client a summary of the types of services and fees we offer. We are an investment adviser and provide advisory accounts and services rather than brokerage accounts and services. There are different ways client can get help with client's investments. Investment advisory and brokerage services and fees differ and it is important for client to understand these differences. Client may learn more about us and other investment advisers and brokers at no charge at Investor.gov/crs.

■ **ITEM II:**

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

- We provide discretionary investment management services to individuals and institutions.
- We do not custody or take possession of your assets. When a client engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with client (unless client impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within client's account(s) consistent with client's investment objectives. Our authority over client's account(s) shall continue until our engagement is terminated.
- As part of our standard services, we review client's account continuously and monitor cash balances and all actively traded stocks held in client's portfolio daily.
- As a fiduciary, we are bound by law to act in the client's best interest. Unlike banks and brokerage firms, we do not sell insurance or financial products that charge a commission resulting in additional costs. Our firm provides fee-based investment services. When client does well, we do well.
- We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investment.
- The minimum account size that shall be accepted by us is five thousand U.S. Dollars (US\$5,000) for U.S. Clients with no minimum subsequent investment amount, and ten thousand U.S. Dollars (US\$10,000) for Non U.S. Clients with no minimum subsequent investment amount. There is no minimum lock-up period. For additional information, please see Form ADV, Part 2A brochure Items 4, 7, 13, and 16.

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 licenses, education, and other qualifications? What do these qualifications mean?*

**■ ITEM III:
FEES, COST, CONFLICTS, AND STANDARD OF CONDUCT**

A. What fees will I pay?

When engaged to provide investment management services, we shall charge either a fee calculated as a percentage of client’s assets under our management (our “Management Fee”) or performance-based fee (our “Performance Fee”).

We charge an annual investment advisory fee according to the following schedule:

Clients	Annual Fee
U.S. Clients	1.00%

Asset-based portfolio management fees are calculated by the custodian and withdrawn directly from the client’s account on daily basis without client’s written authorization. The daily fee is calculated as follows:

$$1.00\% \times (1/\text{trading days in a year}) \times \text{daily net asset value}$$

Trading days is estimated to be about 252 days in a year.

We use the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients who are “Qualified Clients” as such term is defined by Rule 205-3 under the Investment Advisers Act of 1940, may otherwise elect to participate in our performance based-fee above a pre-determined hurdle rate fee structure.

Performance-Based Fees or Performance Fees are only assessed for the accounts of Qualified Clients who elect the performance fee structure and for the accounts of Non-U.S. Clients.

Clients	Asset-based fee	Performance Fee
- Non U.S. Clients - U.S. Qualified Clients (<i>who elect to this fee structure</i>)	0.00%	15% of quarterly profits above 1.25% hurdle rate

Performance fees are calculated by the custodian and withdrawn directly from the client's accounts without client's written authorization at the end of each calendar quarter.

With respect to clients who participate in our performance fee structure, we receive a quarterly performance fee in amount equal to 15% of net quarterly profits above a 1.25% "hurdle rate", and only to the extent that such appreciation causes the net asset value to exceed its high-water mark. The hurdle rate is intended to be a quarterly return of 1.25% on the value of an investor's investment, calculated as of the beginning of each quarter. To the extent that the hurdle rate and/or high-water mark are not achieved in any calendar quarter, we will not receive a performance fee. The high-water mark will be the highest value of the client's account within the past 4 quarters (known as a 4-quarter "look back period"), after accounting for the client's deposits or withdrawals for each billing period. Performance fees may be made at any time, in the sole discretion of us, for a client who makes a complete withdrawal. Profit is calculated by the amount increase (whether realized or unrealized), if any, in the net market value of the account in the preceding quarter, after deduction of all related expenses and commissions paid, including transactional costs (i.e., brokerage and custodial fees).

We do not charge asset-based compensation for clients who are charged performance fees.

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by us.

Neither our supervised persons nor we accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

The amount of assets in a client's account affects our advisory fee; the more assets a client has in a client's advisory account, the more a client will pay us and thus we have an incentive to increase those assets in order to increase our fee.

Furthermore, client's investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions. Client may incur brokerage commissions, transaction fees, and administrative charges imposed by custodians and broker-dealers.

Client will pay fees and costs whether client makes or loses money on client's investments. Fees and costs will reduce any amount of money client makes on client's investments over time.

For more detailed information about our fees and costs related to our management of your account, please See Item 5 and Item 6 in our ADV Part 2A.

Conversation Starters. Ask your financial professional:

- *Help me understand how these fees and costs might affect my investments?*
- *If I give you \$500,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

B. What are your legal obligations to me when acting as my investment adviser and how does your firm make money?

As a client's investment adviser and fiduciary, we act in a client's best interests at all times. Primarily, we benefit from the advisory services we provide to a client because of the advisory fees we receive from a client. At the same time, the way we make money creates some conflicts with a client's interests. As an example, we may recommend a particular custodian to custody a client's assets, and we may receive support services and/or products from that same custodian, certain of which assist us to better monitor and service a client's account while a portion may be for the benefit of our firm. Other potential conflict of interest would be that the more assets in a client's account(s), the more a client will pay in advisory fees. Therefore, we have an incentive to encourage a client to increase assets in his/her account. A client should understand and ask us about these conflicts because they can affect the investment advice we provide a client.

Our investment management fees are fully disclosed and competitive with other full-service investment advisers. We do not partake in commissions or invest in commission-based products such as mutual funds with sales loads, annuities, insurance policies, mortgages, etc. We do not directly or indirectly compensate any person for client referrals.

Conversation Starter. Ask your financial professional:

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

■ ITEM IV: DISCIPLINARY HISTORY

Christmas Corporation and its employees have not been subject to any legal or disciplinary events by regulators nor is it a party to any legal events material to client evaluation of our advisory business. We encourage client to visit www.Investor.gov/CRS to research our firm and our financial professionals.

Conversation Starter. Ask your financial professional:

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

■ **ITEM V:
ADDITIONAL INFORMATION**

For additional information on our advisory services, see our brochures available at <https://adviserinfo.sec.gov/firm/summary/282245>. Client may contact our Chief Compliance Officer at any time to request a current copy of your ADV Part 2A or our relationship summary. Our Chief Compliance Officer may be reached by phone: +1 424 645 5003.

Conversation Starter. Ask your financial professional:

- *Who is my primary contact person?*
- *Is he or she a representative of an investment-adviser or a broker-dealer?*
- *Who else can I talk to about my portfolio(s)?*

Exhibit A – Material Changes to Client Relationship Summary

There are no material changes since the prior Client Relationship Summary.