

# **Form ADV Part 3**

## **(Form CRS – Client Relationship Summary)**

**Feldman, Ingardona & Co.**  
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**Introduction:** Feldman, Ingardona & Co. (the “firm”) is a registered investment adviser with the U.S. Securities and Exchange Commission (“SEC”). We offer our clients investment advisory services. The Firm is also licensed as a business entity with the Illinois Department of Insurance. Clients should be aware that services and fees differ between investment advisers and broker-dealers and it is important for retail investors to understand the differences. Free and simple tools are available for you to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS), a website maintained by the SEC. These tools can provide you with educational materials about broker-dealers, investment advisers, and investing in general.

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

Our firm provides both discretionary and non-discretionary investment advisory services for portfolios of high-net-worth individuals and families, institutions, pension and profit-sharing plans, trusts and business entities. Discretionary authority means that we are authorized to buy and sell securities for your account without your prior consent. In a non-discretionary relationship, we will make recommendations to you, but you will make the ultimate decision regarding the purchase or sale of investments. These services focus on the entire process of portfolio management by working with the client to organize the portfolio and develop an overall strategy to address the needs and investment objectives for the portfolio. The strategy includes a long-term strategic asset allocation, selection of investment managers and mutual funds to be used in the portfolio and performance measures according to which the overall portfolio and all investments for the portfolio will be monitored. The strategy is tailored to the individual needs and objectives of each client relationship.

We focus on the entire process of portfolio management by working with you to organize the portfolio and develop an overall strategy to address the needs and investment objectives for the portfolio. The strategy includes (1) a determination of the long-term strategic asset allocation for the portfolio, (2) the decision of whether to vary the asset allocation over shorter time periods, (3) the selection of the best and most cost effective method to achieve the asset class returns incorporated in the long-term strategic asset allocation and (4) a comprehensive report to measure the portfolio’s investment performance against benchmark returns.

Client investment portfolios are reviewed at a minimum of once a quarter by our firm’s officers. Market conditions that might cause a wide variance in the overall asset allocation, or other factors, could cause a more frequent review.

For additional information, please review our Form ADV Part 2A Brochure (Items 4 and 7) which is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or requesting a copy from us by calling the number noted above.

### **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?**

The specific manner in which fees are charged by us is established in a client’s written investment advisory agreement. Generally, the fee will be payable quarterly in advance based on the value of the portfolio as of the last day of the previous calendar quarter. Although minimum investment varies depending on the type of client and extent of services, generally the minimum account size is \$5,000,000.

Fees may be paid direct by the client, or the client may authorize the custodian holding client funds and securities to deduct advisory fees direct from the client account in accordance with statements prepared and submitted to the custodian by us. The custodian will provide account statements to the client, no less than quarterly. Such statements will reflect all fee withdrawals

by us. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

In certain circumstances, advisory fees may be negotiated and may differ among clients based upon a number of factors, such as the number of investing entities or accounts in the investment portfolio and the complexity of the overall investment strategy.

**Other Fees and Costs:** The Firm's advisory fees do not include commissions, transactions fees, account maintenance fees, and other related expenses charged by the custodian or broker to your account. Additionally, products such as ETFs and mutual funds carry internal management fees and other expenses which are disclosed in the product's prospectus or disclosure document. None of these other fees and costs are paid to us. Clients are not obligated to use the services of the investment managers, mutual funds or any broker-dealer or custodian and may use any broker-dealer or custodian that they choose.

You will pay fees and costs whether you make or lose money on 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. For additional information about our fees, please review our Form ADV Part 2A Brochure (Item 5) which is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Questions to ask us:

*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 have to act in your best interest and not put our interests 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 instances to help you understand what this means.*

Our firm is compensated based on the value of the accounts we manage. As a result, to the extent that we manage more of your assets, we would benefit by receiving higher investment advisory fees.

The Firm conducts IRA rollovers from 401(k) plans for our clients. It will benefit us to recommend a rollover or increase the assets managed by us which constitutes a conflict of interest as the more assets we manage, the more you will pay in advisory fees. We mitigate this conflict by discussing all of your options to help you determine the most appropriate choice for you.

Another instance is if any insurance commissions are collected by us. In order to address this conflict of interest, we disclose the amount of commission to our client and in turn reduce the client advisory fee by that amount on a dollar-for-dollar basis.

For additional information, please see our Form ADV Part 2A Brochure on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Questions to ask us:

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

**How do your financial professionals make money?**

Our financial professionals are compensated based on our firm's overall performance of fees received from all clients less expenses. Compensation is in the form of a base salary and distributions according to the ownership interest of the Firm.

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

No. Please visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) for a free and simple tool to research our Firm and financial professionals.

Questions to ask us:

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

**Additional information:**

You can always contact us for up-to-date information and a copy of this relationship summary at (630) 663-1800 or find additional information about our advisory services on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Questions to ask us:

*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?*