

STAR HARBOR INVESTMENTS INC

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www.starharborinvestments.com

03/31/2025

Form ADV Part 3

Star Harbor Investments Inc (“The Firm,” “We,” “Our” or “Us”) is an investment adviser registered with the United States Securities and Exchange Commission. Such registration does not imply competence. Free and simple tools, and educational materials about broker-dealers, investment advisers, and investing are available to research firms and financial professionals at <https://www.Investor.gov/CRS>.

Relationships and Services

What investment services and advice can you provide me?

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A (“Disclosure Brochure”). Our services include investment and portfolio management. As part of our standard services, we monitor investments that we manage on a continuous and ongoing basis. There are no material limitations to our monitoring. We accept discretionary authority to implement the recommended transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. We do not offer advice only with respect to proprietary products. We offer advice on mutual funds, exchange-traded funds (“ETFs”) and independent investment managers. Your account may also have individual debt and equity securities and options. Where appropriate, we provide advice about any type of legacy position or other investment held in your portfolio; however, you should not assume that these assets are being continuously monitored or otherwise advised on by us unless specifically agreed upon. Our services are not subject to a minimum fee or account size.

Additional information about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and available to all clients by going here: ADVISERINFO.SEC.GOV and searching for our name.

Let’s discuss... 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, and Standards of Conduct

What fees will I pay?

Fees for individually managed accounts range up to 2% annually depending on the complexity of the services to be provided, the level of assets managed and overall relationship with the advisor. The asset management fee will be determined at the time of the advisory agreement. Our fee is billed quarterly in advance based on the total market value of your account on the first day of the current calendar quarter. Fees and costs will reduce any amount of money you make on your investments over time.

The Firm offers a wrap fee program to our clients. In a wrap fee program, the asset-based fee will include most transaction costs and fees of the broker/dealer or bank that will hold your assets (called “custodian”). As a result, wrap fees are typically higher than non-wrap advisory fees. Although transaction fees are usually included in the wrap program fee, sometimes you will pay an additional transaction fee for an investment bought or sold outside the wrap fee program. Paying for a wrap fee program could cost more than separately paying for advice and for transactions if there are infrequent trades in your account.

As your asset base changes, you will see an increase in the fee if your value has increased. Therefore, the firm may have an incentive to encourage you to increase the assets in your account or manage them in a way where we receive higher fees. On the other hand, you will see a decrease in the fee paid to Star Harbor Investments Inc, if your account value has declined. Fees and costs will reduce the amount of money you make on your investments over time. Additional information about our fees can be found in Item 5 of our Disclosure Brochure and available to all clients or by going here: ADVISERINFO.SEC.GOV and searching our name. Please make sure you understand what fees and costs you are paying.

Let's discuss... Help me understand how these fees and costs might affect my investments. If I give you \$200,000 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 are obligated to 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. The following is an example to help you understand what this means:

- Our firm and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. In such circumstances, our firm or its investment adviser representatives may have a financial interest in recommending investments that our firm or its representatives also own.
- Third-Party Payments: While we do not receive compensation from third parties when we recommend investments, our supervised persons or affiliates may recommend insurance products in their individual capacities. This results in an incentive for our supervised persons or affiliates to recommend those insurance products.

Let's discuss... How might your conflicts of interest affect me, and how will you address them?

Additional information about our conflicts of interest can be found throughout our Disclosure Brochure and available to all clients or by going here: ADVISERINFO.SEC.GOV and searching for our name.

How do your financial professionals make money?

Star Harbor Investments Inc and its investment adviser representatives receive compensation based on a percentage of your assets under management. As the value of your assets under management increases, the total compensation you pay to the firm and its representatives also increases. However, if your account value decreases, you still pay a fee to the firm and its representatives.

Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.

Do you or your financial professionals have legal or disciplinary history? For what type of conduct?

Yes, one of our financial professionals has a legal or disciplinary history disclosure. You can visit <http://investor.gov/crs> for a free and simple search tool to research us and our financial professionals.

Let's discuss... As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

To obtain additional information regarding our services or to request a copy of this relationship summary, please contact Michelle Miller at 813-716-3581.

Let's discuss... 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?

Our Firm and its representatives have a fiduciary duty to all clients. Please call us at 813-716-3581 if you have any concerns.