

ADV Part 3 – Form CRS (Client Relationship Summary)

November 2025



Introduction

ESL NewCo I, LLC (“ESL-Alesco”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you, the retail investor, to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides education materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We are a registered investment adviser offering investment advisory services to retail investors (among other types of clients). Of the clients we primarily service, most clients grant us day-to-day management authority. This is accomplished through a pre-arranged investment management agreement that you would sign.. Such an agreement would explicitly state our authority to regularly monitor, direct trades, and make other decisions related to your account(s). Prior to managing your assets, an asset allocation plan is discussed with you. Other information, such as investment restrictions, fees, and your tax situation, is gathered by us prior to trading your account. We offer financial, tax, estate and insurance planning services to the extent agreed upon by you and our firm. In certain instances, we are hired by clients to perform consultative services. The extent of these services would be pre-determined mutually prior to entering into an agreement. Some examples of these services would include, but are not limited to, consolidated reporting, asset allocation recommendations, recommendations on securities held, financial planning, and retirement plan advisory services (including employee education and security recommendations). In these instances, we may not have discretionary investment authority – we will only make recommendations, and you, the retail investor, would make the ultimate decision regarding the purchase or sale of investments.

We participate as a portfolio manager for various managed account programs. These are programs where we partner with other firms that provide complementary services. These include programs with RBC Wealth Management and LPL Financial. These arrangements have unique characteristics and fee structures that are described in detail on ESL-Alesco’s Form ADV, Part 2A Brochure (Items 4, 5, 7, and 12), which is available online at <https://adviserinfo.sec.gov/firm/summary/108590>.

We accommodate the restrictions and limitations that clients place on our authority to manage portfolios. Though ESL-Alesco may invest in a multitude of securities, mutual funds and exchange traded funds (ETFs) are the most commonly recommended types of securities for accounts where we serve as the discretionary investment manager. For accounts that are not considered part of a managed account program (referenced in the previous paragraph), we have a stated relationship minimum of \$3 million, though exceptions exist for relationships that we feel have the potential to achieve this minimum value.

Conversation Starter – Ask your financial professional: (1) Given my financial situation, should I choose an investment advisory service? Why or why not? (2) How will you choose investments to recommend to me? (3) What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay? In most cases, client advisory fees are based on assets under management (in certain instances, we will negotiate a fixed fee amount with the client, but these instances are generally rare). Our tiered fee schedule for managed accounts is as follows: .90% annually for amounts between \$0-\$500,000; .60% annually for amounts between \$500,000-\$2,000,000; .40% annually for amounts between \$2,000,000-\$10,000,000; .35% annually for amounts between \$10,000,000-\$50,000,000, .30% for amounts above \$50,000,000. Generally, fees are billed semi-annually in advance for a six-month period. Although the fee schedule displayed above represents the standard management fees we charge, fees may be negotiable. This is determined on a case-by-case basis, and any variation from the above fee schedule must be approved by a senior manager at ESL-Alesco. You may be charged a minimum management fee that could effectively be

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higher than the fee that would be generated using the above fee schedule. This would generally apply to relationships that are under ESL-Alesco's stated minimum account size. The presence of a minimum fee is fully disclosed to the client prior to signing an investment management agreement with us. If you are a client of a managed account program (see page one for a description), fees charged within the programs will include most transactions costs and broker-dealer fees (these costs are typically outside of our control) in addition to our management fee.

Other Fees and Costs: Brokerage commissions and miscellaneous brokerage fees (such as wiring fees or asset transfer fees) may also be incurred. When we have the authority to select a broker-dealer custodian, minimizing these costs is taken into consideration during the selection process. These fees would be disclosed on a custodian statement and are also available from us upon request. Separately, mutual fund and exchange traded fund expenses would affect the performance of an individual security held in a client's portfolio. We do not accept compensation for the sale of securities or other investment products. Individuals who are not investment management clients may pay a financial planning fee, charged at a fixed rate.

Additional Information: 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.

Conversation Starter – 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 be invested for me?*

What are your legal obligations to me when acting as my investment adviser? **When we act as your investment adviser**, we have 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. Here are some examples to help you understand what this means: ESL-Alesco and a third-party service provider (such as a retirement plan administrator), may share several clients based on referrals from both parties to one another (ESL-Alesco and the third-party provider). Additional information about our conflicts of interest is provided throughout our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/108590>.

How do your financial professionals make money? Our financial professionals are compensated based on the revenue the firm earns from the professional's advisory services or recommendations.

Disciplinary History

Do your financial professionals have legal or disciplinary history? No. Visit [Investor.gov/crs](https://investor.gov/crs) for a free and simple search tool to research our firm and financial professionals.

Conversation Starter – Ask your financial professional: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information

You can find additional information about our investment advisory services on the SEC's website at www.adviserinfo.sec.gov (our CRD number is 339091). You may also contact us at (585) 586-0970 to request a copy of this summary and all of our regulatory disclosure documents.

Conversation Starter – Ask your financial professional: *Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*