

FORM-CRS CUSTOMER RELATIONSHIP SUMMARY

Cognis Retirement Group, LLC (“CRG”) is registered with the State of Arizona as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for the retail investor (“you” or “client”) to understand the differences. Free and simple tools are available to you at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Q | What investment services and advice can you provide me?

Investment authority. CRG® provides discretionary and non-discretionary investment advisory services for a fee to institutional and retail clients. When we provide investment advice to clients on a nondiscretionary basis, the client makes the ultimate decision for purchase or sale of investments.

When we act as a discretionary investment manager, we manage portfolios using passive/indexed strategies including U.S., global and international (non-U.S.) equity, U.S. and emerging market debt, and fixed income. We manage accounts in accordance with clients’ investment guidelines.

We will accept investment restrictions from you provided that the restrictions do not hinder our ability to execute your stated goals & objectives.

Monitoring. We review the assets of client accounts on a continuous basis to ensure they are being managed consistently with the applicable investment strategy. A limitation on such monitoring is that it is not always performed by our investment professionals, but instead client accounts are tested daily as part of an automated compliance process for adherence to investment guidelines and client-imposed restrictions.

Account minimums and other requirements. We have established separate account minimums for various client types and investment strategies. These account minimums range from \$500 for individual clients using our robo-advisory services to \$250,000 for institutional clients. However, these minimums may be waived at our discretion.

Additional information. *More detailed information about our investment advisory business, client types, account minimums and investment strategies are included in Items 4, 7 and 8 in our [Form ADV, Part 2A \(“Brochure”\)](#).*

Conversation Starters

- *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?*

Q | What fees will I pay?

Principal fees and costs. We charge annual fees, payable monthly in arrears. We will prorate fees based on the length of time we managed your account in the event you opened or terminated your account during the quarter. Ongoing fees will reduce the value of your portfolio over time. Because of the fees you pay, you will have a smaller amount invested that is earning a return whether fees are paid separately or debited from your account. We encourage you to discuss the impact of fees with your client relationship manager.

Other fees and costs. In addition to, and separate from, investment advisory fees, you typically will pay other costs and charges in connection with your account or securities transactions, most of which are payable to parties other than us or our affiliates. Common examples include commissions and charges for executing trades through broker-dealers, dealer mark-ups, mark-downs and spreads, exchange fees, taxes, costs associated with foreign exchange transactions, fees imposed in connection with your custodian, trustee or other account services, and other account service fees.

When we invest in shares of mutual funds or exchange-traded-funds (ETFs), you are subject to account level advisory fees in addition to mutual fund or exchange traded fund internal advisory fees and expenses. Exchange traded funds and closed-end funds can trade at prices that vary

from their net asset value, sometimes significantly. In addition to fees and expenses listed above, expenses include sales, accounting, tax and audit, legal, and other expenses not listed. Details regarding expenses can be found in the applicable offering memorandum of the asset manager.

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.

For more detailed information about fees and compensation, please refer to Item 5 in our [Form ADV, Part 2A](#), your investment advisory agreements, mutual fund prospectuses or other offering memoranda.

Conversation Starters

- 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?

Q | 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 must act in your best interests and not place our own interest ahead of yours. Our portfolio managers typically make investment decisions for multiple clients and across multiple portfolios using various investment strategies depending upon each client's portfolio guidelines and restrictions. We seek to conduct ourselves in a manner we consider the most fair and consistent with our fiduciary obligations to you and make investment decisions based on your investment objectives, restrictions, permitted investment techniques, available cash, and other relevant considerations. Conflicts of interest that arise in managing your account and accounts for other clients include, for example, conflicts among investment strategies, conflicts in the allocation of investment opportunities or conflicts due to different fees.

To help manage conflicts, we have implemented controls, including managing similar accounts to strategy-based model portfolios, adhering to trade order aggregation and allocation policies, and periodic monitoring and review of performance of accounts to identify outliers and to ensure

we do not charge you investment management fees that are excessive.

Additional information. More detailed information about our conflicts of interest are included in Items 4, 5, 6, 10, 11, 12 and 14 in our [Form ADV, Part 2A](#).

Conversation Starters

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

Q | How do your financial professionals make money?

Our financial professionals are paid a fixed base salary and discretionary bonus. For those financial professionals who also are employee owners (known as 'principals') of the firm, these financial professionals also are eligible to receive a share of our firm's profits.

Q | Do you or your financial professionals have legal or disciplinary history?

No, we do not have any legal, financial, or other disciplinary items that are material to our investment advisory business or to our executive management to report. We are obligated to disclose any disciplinary event that we believe you would find material when evaluating us to initiate or continue a relationship with our firm. You can visit [Investor.gov/CRS](https://www.investor.gov/crs) for free and simple search tool to research us or our investment professionals.

Conversation Starters

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

Additional information. If you have any questions about our investment advisory services or if you wish to request a copy of our Relationship Summary, please contact info@cognisgrp.com. You can also call (480) 877-0067 for up-to-date information and request a copy of our Relationship Summary.

Conversation Starters

- 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?