

Crecer, LLC

Form CRS - Conversation Starters

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Given my financial situation, should I choose an investment advisory service? Why or why not?

Crecer is registered with the U.S. Securities and Exchange Commission as an investment adviser and provides advisory services rather than brokerage services. These services differ from each other, and it is important for you to understand the differences before choosing which is right for you. As investment advisers we have a fiduciary duty to act in your best interest at all times and we feel it is important to give you information on advisory services, more specifically our advisory services and brokerage services.

Whether you should choose an investment advisory service depends on your individual goals, comfort with managing investments on your own, and the complexity of your financial situation. There is no one size fits all when it comes to investing but there are some important distinctions to consider when deciding whether investment advisory services or broker-dealer services are right for you. A few key points to consider are listed below.

Feature	Broker-Dealer Services	nvestment Advisory Services	
Primary Role	Helps you buy and sell securities	Provides ongoing advice and manages investments	
Relationship Type	Transaction-based; advice is incidental to a trade	Fiduciary relationship; advice is the primary service	
How You Pay	Pay per transaction (commissions or markups)	Pay a fee based on assets under management or a flat/monthly fee	
Legal Standard	Regulation Best Interest – must act in your best interest at time of recommendation	Fiduciary standard – must act in your best interest at all times	
Ongoing Monitoring	Not required to monitor your account	Typically includes ongoing monitoring and portfolio reviews	
Discretion	Often non-discretionary and you will get to decide what securities to trade and when.	The adviser has discretionary authority and gets to decide when and what to trade.	

Product Offerings	May recommend proprietary products or those with higher commissions	Typically recommends third-party or low-cost diversified investments
Conflicts Of Interest	May earn more from certain products or frequent trading	Must disclose and minimize conflicts; cannot accept commissions for advice
Account Types	Brokerage accounts	Advisory accounts
Who Regulates Them	FINRA and SEC	SEC or State securities regulators

If you should decide that investment advisory services are right for you, there are some additional considerations to keep in mind when choosing whether to use a robo-adviser or a human financial adviser. If you're looking for a professionally designed investment portfolio, automated rebalancing, goal-based investing support, and low-cost, hands-off portfolio management, then a robo-adviser may be a good fit. However, if you have highly complex needs such as estate planning, tax strategy, business ownership, etc. you may benefit from having a human financial adviser.

How will you choose investments to recommend to me?

We will choose which investments to recommend to you based on your time horizon, risk tolerance and investment goals. We will collect all of this information from a questionnaire you complete during your account set up and onboarding process. Based on these factors we will select multiple ETFs and create a portfolio for you. The portfolio we create for you is meant to mirror the glide path of a traditional target date fund by gradually reducing exposure to equities and increasing exposure to fixed income and other more conservative asset classes as you approach your target retirement date. We regularly monitor and rebalance your portfolio to make sure it is in line with the risk and return parameters we have set. We will periodically ask you to review your risk tolerance and investment goals and update them if necessary. If your needs change, we will adapt your portfolio to change with them.

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Our investment services are automated and provided through a platform developed and overseen by investment advisory personnel that include investment professionals and engineers. Our personnel have a wide range of experience developing financial systems and managing investment portfolios.

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?

When you invest \$10,000 with our firm, your full amount is typically invested right away—we do not deduct fees upfront. However, you will incur certain ongoing costs that may reduce your investment returns over time. The descriptions and table below provide a breakdown of the fees you would likely pay if you invested \$10,000 with us.

Advisory Fee:

We charge an annual advisory fee of \$60, billed monthly in arrears. For a \$10,000 investment, this equals \$5 per month. This fee covers portfolio management, rebalancing, and access to our digital investment platform. If your account balance is less than \$1000, we will waive our advisory fee for that billing cycle.

It is important to remember that fees may vary depending on your account balance, and the specific ETFs in your portfolio. If you have an account balance of \$20,000 or greater, your fee will be 0.30% annually based on the average daily balance of your account. This fee breaks down to approximately 0.025% monthly. We will take the average daily balance of your account for the month and use that to calculate the fee you owe that month. All fees will still be billed monthly in arrears. Charging fees as a percentage of assets under management means that the actual dollar amount you pay in fees can fluctuate from month to month and may result in higher or lower fees depending on gains or losses.

ETF Expense Ratios:

The exchange-traded funds (ETFs) we use in your portfolio also have internal operating expenses called expense ratios. These are typically low, averaging around 0.10% annually, which would equal about \$4.50 per year on a \$10,000 investment. These fees are not typically charged directly to you but are reflected in the fund's performance.

Trading and Custody Fees:

All of our clients are enrolled in our wrap fee program, meaning that we cover all of the fees charged by custodians and brokerages for trading or account custody as part of our advisory fee.

In total, your estimated annual fees and costs on a \$10,000 investment would be around \$64.50 per year, depending on your specific portfolio. While these costs reduce your returns slightly, they support ongoing portfolio management and access to our digital tools.

Fee Type	Amount	How It's Charged	Estimated Annual Cost
Advisory Fee	\$60 annually	\$5 a month will be deducted from your account.	\$60
ETF Expense Ratio	Around .045% annually	Generally built into fund performance and not billed directly	\$4.50
Trading Fees	\$0	See below*	\$0
Custodian Fees	\$0	See below*	\$0
Total Fee	-	Automatically deducted throughout the year	\$64.50

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

As a fiduciary, we are required to act in your best interest. However, like all investment advisers, we may have some conflicts of interest. Here are a few examples, and how we handle them:

We recommend only certain ETFs.

We may limit investment choices to funds we've already done fundamental and quantitative analysis for, which might not include every option on the market. To mitigate this conflict of interest we stick to our disciplined process to select low-cost, diversified ETFs. We are not paid any commissions or third-party payments, and thus we do not take them into consideration when deciding which ETFs to invest in.

Our fees are based on assets under management (AUM).

Since in some cases our fees are based on assets under management, the amount of fees we are paid increases as the amount you have invested increases. While this aligns our goals with yours in many cases, it does incentivize us to encourage you to invest more and keep assets in your account. We have a fiduciary duty to always act in your best interest and will always recommend the course of action we believe to be in your best interest, even if that means forgoing investing, making withdrawals, or investing elsewhere.

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

No, neither Crecer nor any of our representatives have any disciplinary history to disclose. If you would like more information about us or any of our representatives, please contact us at info@crecer.app or visit www.investor.gov/crs for a free and simple search tool to research Crecer and our financial professionals.

Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer?

We strictly offer investment advisory services and none of our employees work as representatives for broker-dealers. Since we offer automated investment advisory services, most of your interactions will occur through our online platform rather than face to face or over the phone. We do not accept directed trades, our system automates portfolio management, account monitoring, and rebalancing.

Unlike a traditional investment advisory firm, you will not have a representative who is your primary contact. If you need help, our client support team is your primary point of contact. They can be contacted at support@crecer.app. While they can assist with technical questions and general account support, they will not provide personalized investment advice unless they are specifically licensed to do so.

Who can I talk to if I have concerns about how this person is treating me?

If you ever have concerns about how you're being treated either by a representative or by the platform you can:

- Contact our Compliance Department at legal@crecer.app or call 415-295-2054
- Submit a support ticket through our website
- File a complaint through the SEC's Investment Adviser Public Disclosure (IAPD) site: https://adviserinfo.sec.gov

We take all concerns seriously and are committed to acting in your best interest.