



FORM CRS- A SUMMARY OF YOUR ADVISORY RELATIONSHIP WITH KILTER GROUP LLC

April 18, 2024

ITEM 1 – INTRODUCTION

Kilter Group LLC, (“Kilter Group”), is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is essential for you to understand these differences. Free and simple tools are available to research firms and our Financial Professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

ITEM 2 - RELATIONSHIPS AND SERVICES

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Kilter Group offers investment advisory and financial planning services to retail investors. Kilter Group manages advisory accounts on a discretionary and non-discretionary basis. In a discretionary account, you have granted written investment authority to your Financial Professional to execute purchase and sell orders in your advisory accounts without consulting with you first. You may limit our discretion, such as by imposing reasonable restrictions on investing in certain securities or groups of securities. Our Firm monitors your investment advisory accounts, and specific investments within your accounts, on an ongoing basis to align with your investment goals. This service is included as part of the Firm’s standard advisory services. With our non-discretionary relationship, calls will be placed presenting the recommendation made and only upon your authorization will any action be taken on your behalf. Our Firm does not impose an account minimum to initiate the advisory and asset management services. If deemed appropriate, our Firm may utilize an independent third-party money manager (“TPMM”) to implement strategies and manage your account. Our Firm offers financial planning services and provides strategies to address the client’s holistic financial picture, including estate, income tax, charitable, cash flow, wealth transfer, and family legacy objectives. We also provide clients investment consulting on a more-limited basis on one-or-more isolated areas of concern such as estate planning, real estate, retirement planning, or any other specific topic.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- 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?

FOR MORE INFORMATION REFER TO OUR FIRM’S ADV PART 2A BROCHURE - ITEM 7, 8, 13, & 16

ITEM 3 - FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

WHAT FEES WILL I PAY?

Kilter Group charges a fee as compensation for providing Investment Management services. Fees are based upon a percentage of assets under management not to exceed 1.90%. Fees are billed monthly in arrears and calculated based on the average daily balance of the Account during the current billing period. If services commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears and any fees due to the Firm will be deducted from the Client’s account during the initial billing period. Investment advisory services include advisory and consulting services, trade entry, investment supervision, and other account-maintenance activities. For clients engaged in our financial planning services, our Firm bills monthly for its financial planning services and access to an online financial planning software portal. Fees range from \$99 to \$500/month and will be agreed to in advance of services being performed and negotiated with the Client. Your custodian may charge transaction costs, custodial fees, redemption fees, retirement plan and administrative fees or commissions. Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six (6) months in advance of services rendered. Although Kilter Group has established a maximum annual fee as stated above, we retain the discretion to negotiate alternative fees on a client-by-client basis. As discussed in Item 2 above, there will be occasions where an independent Registered Investment Advisory firm acts as a TPMM to our Firm. In those circumstances, the other investment advisor manages the assets based upon the parameters provided by our Firm. The TPMM will charge an asset-based fee that is in addition to the advisory fee listed above and not to exceed 1.00%. We have an incentive to increase your assets under our management over time to increase our fee over time. 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.

QUESTIONS TO 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 go to fees and costs, and how much will be invested for me?

[FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 5](#)

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 a legal, fiduciary obligation 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. We want you to understand and ask us about these conflicts because they can affect the investment advice we provide you. We believe focusing our attention and internal incentives on the long-term success of all our clients, along with providing full transparency on our fees and conflicts of interest, is the best path to meeting our fiduciary duty. 1) Our management fees increase when assets under our management increase. This incentivizes us to encourage you to invest more of your assets with us. 2) Our management fees decrease when assets under our management decrease. This incentivizes us to discourage you from reducing your assets under management with us. 3) Our Firm receives services at no cost or at a discounted cost from the custodians where our Firm's client assets are held. These services range from receiving data on our clients' accounts to business consulting services. This incentivizes us to work with custodian firms that provide the most attractive services to us, even if they do not benefit you directly. 4) Some of our Financial Professionals are insurance licensed and receive compensation (commissions, trails, or other compensation from the respective insurance products) as a result of effecting insurance transactions for clients. We recognize the fiduciary responsibility to place the client's interests first and have established policies in this regard to avoid any conflicts of interest.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

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

[FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 10, 11, 12, & 14](#)

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our Financial Professionals are compensated based on the revenue our Firm earns from our investment advisory fees. This compensation is based on the amount of assets they service, the amount of time spent, and the complexity required to meet the client's needs or revenue based on the recommendations provided by our Financial Professionals. Some of our Financial Professionals are insurance licensed and receive commissions, trails, or other compensation through various carriers. While some of our Firm's Financial Professionals are engaged in outside business activities, we are required to disclose material outside business activities and any conflict it may pose to you. Our Firm supervises the business activities of our Financial Professionals through our compliance program. All Financial Professionals are required to follow a Code of Conduct to mitigate any conflicts to you.

[FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 5, 10, 11, 12 & 14](#)

ITEM 4 - DISCIPLINARY HISTORY

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

YES. Visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our Financial Professionals.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

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

[FOR MORE INFORMATION REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 9](#)

ADDITIONAL INFORMATION

For additional information about our investment advisory services visit the SEC's website at www.adviserinfo.sec.gov. Our Firm's IARD number is: 330356. You may also contact us directly for up-to-date information and request a copy of the relationship summary at: 646-438-6557.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Who is my primary contact person? Is he or she an investment adviser or a representative of a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

MATERIAL CHANGES SINCE LAST FILING- This is the firm's initial SEC application. There are no material changes to disclose.