



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

If you have goals to meet and some money to invest, then you may decide you need professional guidance. There's no need to go-it-alone! The investment world is complex, often confusing, but also full of opportunity. There are two types of financial firms that you might be trying to choose from, broker-dealers and investment advisers.

The *Stella Nova* service is a wrap fee program offered by Golden State Asset Management, an investment adviser. As an investment adviser, we provide ongoing advice and regular monitoring of your account and are held to a fiduciary duty that means we have both a duty of care and a duty of loyalty.

- **The duty of care always requires us to place your best interests ahead of our own. We are also required to monitor your portfolio, investment strategy, and investments throughout the duration of our advisory relationship with you. When you participate in the *Stella Nova* program, our software monitors your account on an ongoing basis.**
- **Under the duty of loyalty, we must eliminate conflicts of interest or tell you about them in a way that you can understand, so that you can decide whether or not to agree to them.**

Investment advisers are generally paid an ongoing fee based on the value of the investments and/or cash in your advisory account. Some investment advisers may have other fee structures, such as fixed fees or hourly fees. As a wrap-fee program, *Stella Nova's fee* includes transaction costs and custody services in your asset-based fee. You do not pay fees on a per-transaction basis. Third-party fees from certain types of investments (like mutual funds and ETFs) are embedded in securities that are purchased for your account. *Securities in your portfolio with GSAM include embedded fund fees, but we do not receive any portion of such fees. These fees are in addition to GSAM's asset-based fee.*

Broker-dealers typically do not monitor you accounts on an ongoing basis but instead give you point-in-time recommendations to buy/sell individual securities or products. Broker-dealers must act in your best interest and not place their interest ahead of yours when they recommend you an investment or investment strategy involving securities. Broker-dealers are not fiduciaries and are not required to monitor your portfolio or investments on an ongoing basis. Clients of broker-dealers typically pay the broker-dealer a fee or commission every time they buy or sell an investment or take a certain type of commission. Many broker-dealers now provide commission-free trading on certain types of stocks, but charge interest on money borrowed for margin trading, earn net interest on idle cash in your brokerage account, or charge fees on transfers or for additional services. Third-party fees from certain types of investments (like mutual funds and ETFs) are embedded in securities that are purchased for your account.

2. How will you choose investments to recommend to me?



We start with you. When you sign up for the *Stella Nova* program, we ask you a series of questions about yourself. We learn your goals and risk tolerance so that we may select the asset class allocation and collection of investments we believe is most suitable for you. These investments are studied and chosen for you by folks who spend every day doing this task. We compare costs (to save you money), analyze risks, and opportunities to choose the allocation and portfolio suited for your investment objectives and risk tolerance.

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

***Stella Nova* is an automated digital portfolio management service and as such, your accounts are managed by algorithms that apply our investment principles and methodology. There are not individuals managing your accounts daily. Information on our investment philosophy and methodology can be found online in the *Stella Nova* Program Brochure at <https://adviserinfo.sec.gov/firm/brochure/299649>.**

4. 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?

Fees will be charged according to the table below:

<u>AUM</u>	<u>Annual Fees in Dollars</u>
\$0 - 100,000	<u>\$300.00</u>
\$100,000.01 - \$110,000	<u>\$330.00</u>
\$110,000.01 - \$120,000	<u>\$360.00</u>
\$120,000.01 - \$130,000	<u>\$390.00</u>
\$130,000.01 - \$140,000	<u>\$420.00</u>
All additional AUM increases from \$0-\$10,000 shall incur an additional \$30/year fee	

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

Most importantly, as an advisory program offered through Golden State Asset Management, we have a fiduciary duty to put your interests ahead of our own, which means that we have



an obligation to always act in your best interest. We believe we have limited conflicts of interests because of the way we are structured, and this program is a fee-only rather than based upon commissions. We earn advisory fees based on your assets under management, rather than through payments from the products in which you are invested (e.g. commissions). However, the more assets there are in your advisory accounts, the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account.

In addition to being held to a fiduciary standard, all personnel at the firm are subject to firm's Code of Ethics, which states that conflicts of interest must be avoided. The Code of Ethics addresses personal trading, other business activities, gifts and entertainment, and confidentiality of client information, among other topics. If you would like more information about how Golden State Asset Management addresses conflicts of interest, please see the *Stella Nova* Program Brochure at <https://adviserinfo.sec.gov/firm/brochure/299649>.

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

No. Visit [Investor.gov](https://investor.gov)/CRS for a free and simple search tool to research us and our financial professionals.

7. 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?

***Stella Nova* is an automated digital portfolio management service and as such, there will not be investment advisor representatives readily available for discussion. If you have concerns about the management of your account, you may contact general customer service line.**