



Invstr Financial LLC
(CRD #310075)
Form CRS Relationship Summary
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Introduction

Invstr Financial LLC (Invstr) is registered with the Securities Exchange Commission (“SEC”) as an investment adviser. Investment advisory and brokerage services and fees differ, so it is important you understand these differences. Free and simple tools are available for you to research firms and financial professionals at <https://www.investor.gov/home/welcome-investor-gov-crs> which also provides educational materials about broker dealers, investment advisers, and investing.

This Form CRS provides information applicable to retail investors. If you are not a retail investor and would like additional information regarding the services we provide, please contact us.

What investment services and advice can you provide me?

We, Invstr, are a non-discretionary investment advisor, acting as an introducing agent to a clearing broker, in this case Apex Clearing LLC (CRD #13071). When you open an account with Invstr, you are effectively also opening an account with the clearing broker whose role it is to support the investment advisor by accepting and executing your orders, reporting your account activity through trading confirms, account statements and the information you view when trading.

Typically, when you open an account with an investment advisor you will be paying an on-going asset-based fee for the services provided. Invstr passes on your instructions to the clearing broker to carry out the transaction in your account, as requested. In this instance, we do NOT make any recommendations as to particular investments or investment strategies, instead we offer statistically based information to help track your performance and that of individual securities and sectors. Furthermore, we do not provide advice as it relates to tax matters. When we provide services to you, we must treat you fairly and comply with a number of specific obligations and cannot place our interest ahead of yours. In certain instances, there may be conflicts of interest. We take every effort to monitor and mitigate those conflicts so that they do not impact the quality of service provided to you. We provide disclosures where appropriate including, but not limited to, the issuance of the clearing

broker's 606 reports and the management of cash in your account via sweep programs. Please see "Legal Options/ Conflicts of Interest" below for more details.

What fees will I pay?

Invstr charges a subscription fee for access to the statistical data (Invstr Stats, Portfolio Builder and Portfolio Optimizer). It does not charge fees or commissions for executing buy and sell orders via the service (Invstr+). Other fees may apply from the clearing broker, such as wire transfers and account terminations. But the clearing broker does not charge commissions with respect to equity securities transactions executed through the Invstr+ platform. Instead, the clearing broker is compensated indirectly by receiving payment for routing certain orders to market makers for execution (known as "payment for order flow"); from participating third party banks with respect to interest payments in cash sweep programs; and in connection with its securities lending program.

Please note, 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.

Other fees you may have to pay include taxes and levies, and fund manager fees depending on the investments you choose. For more information about the fees and costs, please refer to the Invstr Fee Schedule on our platform and website. Fees may change without notice and any changes will be reflected in the Invstr Fee Schedule.

Legal Obligations / Conflicts of Interest

We do not provide recommendations. Instead, we offer statistically based information to help track your performance and that of individual securities and sectors. The way we make money may create some conflicts with your interest. You should understand and ask about these conflicts because they can affect the services we provide you. Here are some examples to help you understand what this means:

Cash Sweeps. As mentioned above, any bank that participates in the Invstr cash management program that receives sweeps of your cash awaiting investment in securities into deposit accounts pays a fee to us equal to a certain percentage of the daily deposit balance of your cash deposited at the bank (Program Bank). This creates an incentive for us to use Program Banks that pay greater compensation to us - although all Program Banks pay the same interest rates to all customers. The interest rates on your funds deposited at the Program Bank will be determined by the amount the Program Bank is willing to pay less the fees paid to us. For more information about the Sweep service you can refer to the Insured Network Deposit Sweep Program Disclosures available in our Disclosures library. Specific information about your deposit account can be found on the Invstr platform or by emailing info@invstr.com

Examples of other Revenues received by Invstr include:

- Stock loan income from lending stocks you purchase
- Interchange fees from purchases made by you with the Sweep Service debit card
- Rebates from market centers to which we route customer orders
- Interest on uninvested cash deposited in interest-bearing bank accounts outside of the Sweep service.

At Invstr, we recognize the importance of maintaining the highest standards of integrity and impartiality in all aspects of our operations. As part of our commitment to transparency and ethical conduct, we have implemented robust measures to identify, disclose, and mitigate any potential conflicts of interest that may arise in our interactions with clients, partners, and stakeholders.

Our conflict of interest mitigation framework encompasses the following key components:

Identification: We proactively identify situations where a conflict of interest may exist or arise. This includes assessing relationships, financial interests, and other relevant affiliations that could potentially compromise our objectivity or impartiality.

Disclosure: We promote a culture of openness and transparency, where employees and stakeholders are encouraged to promptly disclose any actual or perceived conflicts of interest. This enables us to assess the situation objectively and take appropriate action to address it.

Assessment: Upon identification and disclosure of a conflict of interest, we conduct a thorough assessment to evaluate the potential impact on our operations, decisions, and relationships. This involves considering factors such as the nature of the conflict, its significance, and the parties involved.

Mitigation: We implement tailored mitigation measures to minimize or eliminate the impact of the conflict of interest. This may include recusal from decision-making processes, establishing firewalls, restructuring relationships, or seeking independent advice to ensure impartiality and fairness.

Monitoring and Review: We continuously monitor our operations and relationships to detect any new or evolving conflicts of interest. Regular reviews of our conflict of interest mitigation framework enable us to identify areas for improvement and reinforce our commitment to ethical conduct.

By adhering to these principles and practices, we strive to maintain the trust and confidence of our stakeholders while upholding the highest standards of professionalism and integrity.

How do your financial professionals make money?

Our professionals do not receive commissions or other compensation related to client assets or clients' investment activities. Our professionals receive salaries and bonuses based on their overall job responsibilities and performance.

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

No. Visit www.investor.gov/CRS for a free and simple search tool to research Invstr and our professionals.

Additional Information

- Invstr does not have any disciplinary events. Visit www.investor.gov for a free and simple search tool to find out about our firm and investment advisor.
- For additional information about the services visit www.BrokerCheck.Finra.org, our website, our broker partner's website, and your account agreements. For additional information about the advisory service, please see our **ADV brochure** on IAPD, or

www.investor.gov or on our website www.invstr.com. You can also contact us directly via email at support@invstr.com

- Helpful Tips: Educate yourself about investment products, including the risks and unique characteristics of those products, perform fee calculations, and review investor alerts and bulletins, and review educational information regarding investment advisors.
- To report a problem to the SEC, which has jurisdiction over investment advisors, visit www.investor.gov or call the SEC's toll-free investor assistance line on (800) 732 0330.
- Apex, Invstr's current clearing firm, holds options in Social Investor, LLC, a subsidiary of Invstr. To mitigate any conflicts, Invstr ensures that Apex has no decision making authority with regards to Invstr or our subsidiaries. We also conduct ongoing reviews and audits of our clearing firm, including an annual review and additional internal training.

Conversation Starters. Key Questions to Ask

1. Given my financial situation, why should I choose an advisory account or brokerage service?
2. Help me understand how much fees and costs might affect my investments. If I had \$1,000 to invest, how much will go on fees and costs, and how much will be invested?
3. What additional costs should I expect in connection to my account?
4. Tell me how you and your firm make money in connection with my account. Do you or your firm receive any payments from anyone besides me in connection with my investments?
5. How might your conflicts of interest affect me, and how will you address them?
6. Do you or your firm have any disciplinary history?
7. What is your level of experience, including licences, education, and other qualifications?
8. Who is the primary contact person? What can you tell me about their legal obligations to me? If I have concerns, who can I talk to?

ADDITIONAL INFORMATION

For additional information about our services and disclosures please visit our website [here](#). Statements in this summary are mandated by the SEC Form CRS and do not create or modify any agreement, relationship or obligation between you and our firm. For more complete terms and conditions of our services please refer to our User Terms and disclosures.