

CLEAR ROCK ADVISORS, LLC  
FORM CRS – CUSTOMER RELATIONSHIP SUMMARY  
MARCH 31, 2021

**Item 1. Introduction**

Clear Rock Advisors, LLC is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment adviser, and investing.

**Item 2. Relationships and Services**

**What investment services and advice can you provide me?**

We offer discretionary investment advisory services to retail investors with separately managed accounts. These advisory services include the formulation of a strategic investment plan specific to each client, followed by the implementation of such plan using product offerings over a variety of investable asset classes.

*Discretionary.* Providing discretionary services means, we will determine the following without consulting you in advance:

- the securities to be bought or sold;
- the amount of securities to be bought or sold; and
- the broker or dealer to be used for a purchase or sale of securities.

However, we do not have discretion to determine the commission rates to be paid to a broker or dealer for your securities transactions. Commissions charged by the broker or dealer are set by the broker or dealer. On occasion, we may recommend an investment product that will require a client signature for purchase. As to these products, our services would be described as non-discretionary.

**Monitoring.** Our portfolios, accounts, and their holdings are monitored on an ongoing basis.

**Limited Investment Offerings.** Generally, we will allocate client assets among various debt and fixed income securities, mutual funds, private investment funds, independent managers, and/or exchange traded funds. This will limit our ability to target specific investment opportunities that are available when individual stocks, bonds and other investment products are used.

**Account Minimums and Other Requirements.** We do not have an account minimum requirement.

In addition to our primary services described above, the firm offers financial planning and consulting services.

**Additional information.** Please see Form ADV, Part 2A brochure (Items 4 and 7 of Part 2A) which can be found at <https://adviserinfo.sec.gov/firm/summary/282716> and clicking on Part 2 Brochures.

**Conversation Starters.** 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?**

**Item 3. Fees, Costs, Conflicts, and Standard of Conduct**

**What fees will I pay?**

For our discretionary and non-discretionary investment advisory services, we generally will receive a blended asset-based fee that will be comprised of the greater of (i) a minimum fixed annual advisory fee, or (ii) an annual percentage (typically 0.25% to 1.00% per annum) of the net asset value of each client account as of the applicable date of determination. These fees are charged quarterly in advance and will be prorated for withdrawals and contributions that occur within a quarter. The applicable advisory fee percentage will be negotiated with each client on a case-by-case basis based on the amount of assets under management and the scope and complexity of services rendered (among other things). In the event of termination of the investment advisory agreement, any unearned fees paid in advance will be refunded to the client (minus any account expenses and reserves for expenses). With this fee structure, the more assets there are in your account, the more you will pay in fees, and the firm may therefore have an incentive to encourage you to increase the assets in your account.

In addition to asset-based fees, clients generally will be required to bear all investment-related fees and expenses associated with their accounts, including, without limitation, transaction commissions, margin and custodial and brokerage fees, sub-advisory fees, and expenses transfer taxes and other fees and expenses relating to transactions in their accounts. Custody and administration fees, to the extent applicable, are charged separately by the custodian or administrator and are in addition to the advisory fees payable to us.

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Our financial planning and consulting services are offered on a fixed or hourly rate basis, negotiable case-by-case, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

**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. Please make sure you understand what fees and costs you are paying. Please see Form ADV, Part 2A brochure (Item 5 of Part 2A) which can be found at <https://adviserinfo.sec.gov/firm/summary/282716> and clicking on Part 2 Brochures.

**Conversation Starter.** 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?**

**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 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. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

We generally recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, as their qualified custodian. We receive products and services from Schwab based upon the assets under management maintained by our firm at Schwab. We receive access to more and better products and services from Schwab as the assets held there increase. This is a conflict of interest because we have an incentive to encourage you to custody your assets at Schwab.

**Conversation Starter.** Ask your financial professional—

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

**Additional information.** Please see Form ADV, Part 2A (Item 12) brochure which can be found at <https://adviserinfo.sec.gov/firm/summary/282716> and clicking on Part 2 Brochures.

**How do your financial professionals make money?**

Our financial professionals that are owners of the firm are equally compensated based upon the profitability of the firm. The firm’s other financial professionals are paid a percentage of the annual asset-based fee charged by the firm for our portfolio management services provided to the financial professional’s clients. With this compensation structure, the more assets there are in your account, the more you will pay in fees, and the firm’s financial professionals may therefore have an incentive to encourage you to increase the assets in your account.

**Item 4. Disciplinary History**

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

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

**Conversation Starter.** Ask your financial professional—

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

**Item 5. Additional Information**

***For additional information about our services,*** please see Form ADV, Part 2A brochure which can be found at <https://adviserinfo.sec.gov/firm/summary/282716> and clicking on Part 2 Brochures. If you would like additional, up-to-date information or a copy of this disclosure, please call (512) 735-0222.

**Conversation Starter.** Ask your financial professional—

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