



## **Form ADV Part 2**

### **Item 1 – Cover page.**

St. Croix Advisors, LLC  
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159000

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January 25th, 2023

This brochure provides information about the qualifications and business practices of St. Croix Advisors, LLC (SCA). If you have any questions about the contents of this brochure, please contact us at 651-337-1919 or [info@stcroixadvisors.com](mailto:info@stcroixadvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

St. Croix Advisors, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about St. Croix Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

No material changes.

In the future, this item will discuss only specific material changes that are made to the brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of the brochure.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Brett Anderson, President at [info@stcroixadvisors.com](mailto:info@stcroixadvisors.com).

Additional information about St. Croix Advisors, LLC is also available via the SEC's website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). In addition, the SEC's website provides information about any persons affiliated with St. Croix Advisors, LLC who are registered or are required to be registered, as Investment Adviser Representatives of St. Croix Advisors, LLC.

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#### **Item 4 – Advisory Business**

St. Croix Advisors, LLC (SCA) offers a broad range of services for individuals and businesses such as but not limited to: Financial Planning and Consulting, Company Sponsored Retirement Plans, Investment Management and Selection of Investment Advisory Services and Providers. St. Croix Advisors, LLC was founded in 2010 and is solely owned by Brett Anderson. St. Croix Advisors, LLC has strategic relations with outside providers to help meet clients' goals and objectives. SCA is committed to minimizing potential conflicts of interest and providing transparent pricing.

When we provide investment advice to clients regarding a retirement plan account or individual retirement account, we are fiduciaries with the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with client interests, so we operate under a special rule that requires us to act in our clients' best interest and not put our interest ahead of our clients' interests.

Under this special rule's provision, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in our clients' best interest;
- Charge no more than is reasonable for our services; and
- Give clients basic information about conflicts of interest.

Our conversations include but are not limited to your overall financial goals and objectives for your family, business, retirement, education funding, estate and income tax reduction, wealth transfer, stock option exercise, investment portfolio design, cash flow and budgeting, and a host of other relevant topics to your personal or business situation. After our initial consultation and meeting, each client enters into a written agreement setting forth the terms and conditions of the engagement and describing the scope of services to be provided. Half the fee for a financial plan is due at the inception of the planning engagement and half is due upon delivery of the financial plan by SCA based upon the information provided by our client (and any other advisors they work with) on their financial goals and objectives. For each client, St. Croix Advisors, LLC reviews investment management strategy via an asset allocation portfolio based on client expectations for risk, time horizon, and returns. St. Croix Advisors, LLC takes a long-term investment perspective when making recommendations. While financial planning is based on future events and expectations, each client is strongly urged to have a plan reviewed annually in order to adapt to new and

ever-changing circumstances. Fees for these services vary and are based upon the expected work to be completed and are highly customized to meet our client's needs. All fees are disclosed and agreed upon in advance of any engagement.

Upon retaining St. Croix Advisors, LLC for financial planning and consulting services, it is completely at your discretion to accept or reject any of our recommendations.

Clients may engage SCA to manage all or a portion of their investment portfolios on a discretionary basis. SCA also may render non-discretionary investment management services to clients relative to variable life/annuity products that they may own, their individual employer-sponsored retirement plans, 529 plans or other financial products. In so doing, SCA either directs or recommends the allocation of client assets among the various investment options that are available.

We may possibly recommend that clients authorize the active discretionary management of their investments by one or more Independent Investment Managers or Registered Investment Advisory Firms based on their stated financial goals and objectives as disclosed in our discussions. The terms and conditions under which clients engage an Independent Investment Manager or additional Registered Investment Advisory Firm will be outlined in a separate written agreement between themselves and the designated option selected. St. Croix Advisors, LLC would continue to provide advisory services by ongoing monitoring and review of the account performance, asset allocation, and investment objectives.

St. Croix Advisors, LLC utilizes outside Independent Investment Managers and Registered Investment Advisory Firms for the majority of its Investment Client's. St. Croix Advisors, LLC has \$71,622,233 million under management.

St. Croix Advisors, LLC, in addition, will provide you with our own ADV Part 2A if you retain our services. If pertinent, you will also receive form ADV Part 2A from the Independent Investment Manager(s) or Registered Investment Advisory Firm. Independent providers may have more restrictive requirements and billing practices than St. Croix Advisors, LLC, which may require St. Croix Advisors, LLC to accommodate those items.

***Retirement Plan Consulting:*** SCA also provides investment advisory services to company sponsored retirement plans. Advisory services provided are in the nature of research, analysis, and selection of investment alternatives. SCA may manage a plan's assets on a discretionary or nondiscretionary basis.

On a non-discretionary basis, SCA contracts with the Plan Sponsor to evaluate and recommend no-load mutual funds for each investment objective and for use in asset allocation strategies. SCA provides Plan Sponsors with periodic research reports on funds held by the Plan, and on additional funds SCA believes should be under consideration. Since

SCA investment advisory services are non-discretionary, the Plan Sponsor makes the final decision as to which investments are offered to participants in the Plan. Each participant then makes the final decision as to which of those investments, and how much of each, is held in his/her account.

In a discretion arrangement with a Plan Sponsor, SCA is an ERISA fiduciary to the Plan. As a fiduciary, SCA supervises and directs the selection, removal and replacement of the investment options offered under the Plan. SCA is charged with providing investments that are consistent with the authorized investment objectives stated in the Plan Sponsor's formal, written Investment Policy Statement (IPS). Services may include development of risk-based and/or target date asset allocation strategies and quarterly monitoring of the Plan investments. The services may be tailored to the Plan Sponsor's desire for its level of involvement in the selection of investment options, either selecting from the entire universe of available funds in categories such as: ETF's, Index Funds, Low Cost Funds, Sector Funds, Actively Managed Funds, etc. SCA does not place any trades for participant accounts and does not have authority to do so for Plan Sponsors, however, SCA may have the discretion to select the investments available to participants.

Under both types of Retirement Plan investment advice, non-discretionary and discretionary, SCA meets with Plan Sponsors at least annually to review the quality of the service provided by SCA and to review investment objectives of the Plan.

SCA's services may also include participant education and enrollment. SCA typically does not make specific investment recommendations to plan participants. However, participants may contract directly with SCA for individual investment advisory services.

St. Croix Advisors, LLC, in addition, will provide you with our own ADV Part 2A if you retain our services. If pertinent, you will also receive form ADV Part 2A from the Independent Investment Manager(s) or Registered Investment Advisory Firm. Independent providers may have more restrictive requirements and billing practices than St. Croix Advisors, LLC, which may require St. Croix Advisors, LLC to accommodate those items

## **Item 5 – Fees and Compensation**

### Fee Schedule:

- Financial Planning - \$4,500.00 fee, and \$1,500.00 yearly renewal updates when using iAdvise System.
- How to Save Money - \$3,000.00 fee, \$300.00 a month for 12 months.
- Family Legacy Planning - \$4,500 base fee, once over 15 hours, \$300.00 hr.
- Major Life Planning - \$4,500 base fee, once over 15 hours, \$300.00 hr.
- Wealth Management & Advisory Investment Service Fee up to 1.50%.
- Technology Fee - iAdvise system \$50.00 per month.
- Hourly Advisor Fee - \$300.00 hour.

Financial Planning, How To Save Money, Family Legacy Planning, and Major Life Planning are billed directly to our clients with 50% collected up front and the final payment collected upon delivery. Cost Basis and Miscellaneous Research, Family Meetings, Business Planning Meetings, Outside Investment Research are billed at our hourly rate in 15-minute increments and is collected directly from our clients at the time of delivery. These items are outside of Investment Management & Advisory Services Fees. Fees for these services vary and are based upon the expected work to be completed and are highly customized to meet our client's needs. All fees are disclosed and agreed upon by our clients in advance of any engagement.

Investment Management & Advisory Services Fees are payable quarterly in advance upon debit instructions delivered to the custodian of each client account. Fees are calculated on the market value of the managed assets on the first day of each calendar quarter. Fees on assets deposited or withdrawn during the quarter will not be prorated based on the number of days remaining in the quarter. Advisory fees are not based on capital gains or capital appreciation of the client's managed account (SEC Rule 205(a)(1)).

For 529 plans, F-2 share class will be held directly with American Funds, we do not charge an advisory fee on these accounts. The mutual fund share class we use do not include 12b-1 fees. You will, however, be required to pay standard custodial and account maintenance fees to American Funds. Please refer to American Funds account opening paperwork for additional information.



For discretionary and non-discretionary Investment Management Services, unless agreed otherwise, fees are negotiated as a percentage of assets under management not to exceed an annualized fee of 1.5%. St. Croix Advisors, LLC, in its sole discretion, may decrease its annual minimum fee and/or charge a lesser management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, historical relationship, related accounts, account composition, negotiations with client, accounts referred to adviser by another professional, etc.)

St. Croix Advisors, LLC deducts Investment Management & Advisory Services Fees from clients' assets unless a client specifically requests the fees to be direct billed or a service provider is unable to offer that feature. These fees are billed on a quarterly basis.

Brokerage commissions (trading costs) and custodial fees of the broker/dealer (custodian of client assets) are in addition to St. Croix Advisors management fees (See Item 12 – Brokerage Practices, below).

The majority of the mutual funds utilized by St. Croix Advisors are purchased on a “non-transaction-fee” basis. A complete explanation of the expenses charged by a mutual fund is contained in the fund's prospectus.

Investment Management & Advisory Service Fees are required to be paid quarterly in advance. If Investment Management & Advisory Service Fees services are terminated, unearned fees paid in advance will be pro-ratably refunded upon the client's request. The refund calculation is based on the number of days remaining in the quarter as a percentage of the number of total days in the quarter multiplied by the number of times the fee is charged. Clients may terminate the Advisory relationship during the first 5 days at no cost.

If we refer you to an Independent Investment Manager or an outside Registered Investment Advisory firm and our fee (Wealth & Investment Management Fee) is included in the advisory fee charged by such Independent Manager or Firm and you choose to engage that independent firm, we will be compensated for our services by a fee paid directly by the Independent Manager or Registered Investment Advisory Firm to St. Croix Advisors, LLC. Generally, St. Croix Advisors, LLC receives 50% of the fees charged by those providers. Any such fees will be paid exclusively from the Independent Managers or Registered Investment Advisory Firm, and will not result in any additional charges or fees to you within this scope of services.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

We provide our services to individuals, families, trusts, estates, charitable organizations, corporations and domestic business entities. We have no account minimum, but St. Croix Advisors, LLC is best suited for those with \$1 million or more in investable assets.

## **Item 8 – Methods of Analysis, Investment Strategy and Risk Loss**

St. Croix Advisors, LLC typically manages each client's portfolio with one of five investment strategies; Conservative, Moderate, Balanced, Growth, or Aggressive, depending on the client's objectives and tolerance for risk. The Aggressive strategy will typically have the most stock market exposure, while the Conservative strategy will have the least. Overall, St. Croix Advisors, LLC's investment strategy is based on a strategic asset allocation discipline; however, it may make tactical adjustments as market conditions dictate. St. Croix Advisors, LLC's strategy also includes diversifying portfolios across several investment styles and industry sectors utilizing primarily no-load mutual funds, however, portfolios may also include individual securities and exchange-traded funds.

Portfolios are built with the intent of utilizing multiple fund managers, each having a distinct and unique process. St. Croix Advisors, LLC will use outside research in selecting managers. This investigation contains extensive quantitative and qualitative analysis of potential fund managers, including a statistical analysis of historical risk/return data, style analysis data, stock selection philosophies, buy and sell disciplines, and manager longevity.

It should be noted that all investments are subject to inherent risks, and investments in the Portfolios' managed by St. Croix Advisors, LLC are no exception. **Accordingly, you may lose money when investing with St. Croix Advisors, LLC.** Portfolios utilizing each of St. Croix Advisors, LLC strategies will **fluctuate**, reflecting day-to-day changes in market conditions, interest rates and numerous other factors. It is possible, even in St. Croix Advisors, LLC's Conservative strategy, **that a client will lose money.** Investing in securities involves risk of loss that client should be prepared to bear. Specific risks include:

**Market Risk.** The market values of securities owned may decline, at times sharply and unpredictably. Market values of equity securities are affected by a number of different factors, including the historical and prospective earnings of the issuer, the value of its assets, management decisions, and decreased demand of an issuer's products or services, increased

production costs, general economic conditions, interest rates, currency exchange rates, investor perceptions and market liquidity.

**Economic Risk.** Changes in economic conditions, for example, interest rates, inflation rates, political and diplomatic events and trends, tax laws and innumerable other factors, can substantially and adversely affect investments.

**Asset Allocation Risk.** Asset allocation may have a more significant effect on account value when one of the heavily weighted asset classes is performing more poorly than the others. Diversification and strategic asset allocation do not assure profit or protect against loss in declining markets.

**Concentrated Portfolio Risk.** To the extent a portfolio has a large portion in a single security or several securities it bears more risk because it is not diversified. Changes in the value of significantly over-weighted security positions may have a much more substantial directional effect, either negative or positive, on the portfolio's performance.

**Emerging Foreign Market Risk.** Investment in the securities of foreign issuers may experience more rapid and extreme changes in value than funds with investments solely in securities of U.S. companies. The securities markets of many foreign countries are relatively small, with limited number of companies representing a small number of industries. Additionally, foreign securities issuers may not be subject to the same degree of regulation as U.S. issuers. Reporting, accounting, and auditing standards of foreign countries differ, in some cases significantly, from U.S. standards. Also, nationalization, expropriation or confiscatory taxation, currency blockage, political change or diplomatic developments could adversely affect investments in a foreign country.

**Fixed Income Risk.** Including: interest rate risk, which is the chance that bond prices overall will decline because of rising interest rates; income risk, which is the chance that a strategy's income will decline because of falling interest rates; credit risk, which is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of the bond to decline; and call risk, which is the chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates. The investment would then lose any price appreciation above the bond's call price and would be forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the investment's income.

Clients should review the applicable Registered Investment Advisor's Form ADV Part II for when St. Croix Advisors, LLC utilizes outside Investment Management and Selection of Investment Advisory Services.

Investing in securities involves risk of loss that clients should be prepared to bear.

**Item 9 – Disciplinary Information**

SCA is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. SCA does not have any required disclosures to this item.

**Item 10 – Other Financial Industry Activities and Affiliations**

Associates of St. Croix Advisors, LLC are insurance licensed for Life/Health/Annuity/Disability/Long-Term Care & Property/Casualty Insurance and generally receives' a commission for the sale of such insurances to its clients. St. Croix Advisors, LLC works with M& A Insurance, Highland Capital Brokerage, and other firms including directly with insurance companies.

St. Croix Advisors, LLC is an Independent Solicitor for Steele Capital Management. As a Registered Investment Advisor Firm, Steele Capital Management pays St. Croix Advisors, LLC a solicitor fee as a percentage of their advisory fee, as disclosed in item 5. Steele Capital Management may help financially sponsor client events hosted by St. Croix Advisors, LLC.

### **Item 11 – Code of Ethics**

St. Croix Advisors, LLC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at St. Croix Advisors, LLC must acknowledge the terms of the Code of Ethics annually, or as amended.

St. Croix Advisors, LLC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which St. Croix Advisors, LLC has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which St. Croix Advisors, LLC, its affiliates and/or clients, directly or indirectly, have a position of interest. St. Croix Advisors, LLC's employees and persons associated with St. Croix Advisors, LLC are required to follow St. Croix Advisors, LLC's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of St. Croix Advisors, LLC and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for St. Croix Advisors, LLC's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of St. Croix Advisors, LLC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. St. Croix Advisors, LLC's recommendations do not generally have the potential for a conflict of interest arising from recommendation of securities traded in an active market. Any purchase or sale of such securities by St. Croix Advisors, LLC consultants should not alter the price of the investment as sold by the issuer. Such securities or investment products may be publicly traded, not publicly traded, or insurance.

**St. Croix Advisors, LLC employees shall:**

- Have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of our clients. Employees' duties at all times are to place the interests of clients first.
- Act with integrity, competence, dignity, and in an ethical manner when dealing with the public, clients, prospects, employers, and fellow employees.
- Practice and encourage others to practice in a professional and ethical manner that will reflect positively upon St. Croix Advisors, LLC.
- Comply with all federal and state securities laws.
- Conduct all personal securities transactions in such a manner as to be consistent with the Code of Ethics/Personal Securities Transactions & Records section of St. Croix Advisors, LLC's Compliance Manual and to avoid any actual or potential conflict of interest or any abuse of an employee's position of trust and responsibility.
- Not take inappropriate advantage of their position or the trust placed in them by St. Croix Advisors, LLC.
- Act as a fiduciary and that information concerning the identity of security holdings and financial circumstances of clients is confidential.
- Use reasonable care and exercise independent professional judgment.
- Strive to maintain and improve their competence.

## **Item 12 – Brokerage Practices**

St. Croix Advisors, LLC does not maintain custody of your assets that we manage; although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. Each St. Croix Advisor, LLC client reserves the right to direct brokerage/custodian business to any financial institution of choice (subject to St. Croix Advisors, LLC’s right to decline or terminate the engagement). We may recommend that our clients use Shareholders Service Group (SSG), a registered broker-dealer, member SIPC, as the qualified custodian or additional service providers. We are independently owned and operated and are not affiliated with SSG or any other service providers. SSG or other providers will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to. While we recommend that you use SSG or another service provider as your custodian/broker, you will decide to do so or not and will open your account with our provider by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Though your account maybe maintained at SSG or another service provider, we can still use other brokers to execute trades for your account as described below (see “Your Brokerage and Custody Costs”). Other custodians can include Pershing, Schwab, TD Ameritrade to name a few. Our Advisors are not affiliated with the custodian's firms. Nor do custodians supervisor our firm.

### **How We Select Brokers/Custodians**

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate those prices
- Reputation, financial strength, and stability

- Prior services to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us From SSG”)

### **Your Brokerage and Custody Costs**

For our clients’ accounts that SSG or other service providers maintains, SSG generally does not charge separately for custody services but is compensated by charging transaction fees on trades that it executes or that settle into your SSG account. Refer to SSG fee schedule for additional fee disclosures.

### **Products and Services Available To Us From Shareholders Service Group:**

They provide us and our clients with access to its institutional brokerage – trading, custody, reporting, and related services. SSG also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business.

**Services That Benefit You.** SSG’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through SSG include some which we might not otherwise have access to that would require a significantly higher minimum initial investment by our clients. SSG’s services described in this paragraph generally benefit you and your account.

**Services That May Not Directly Benefit You.** SSG also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research that of third parties. We may use this research to service all or a substantial number of our clients’ accounts including accounts not maintained at SSG. In addition to investment research, SSG also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution
- Provide pricing and other market data
- Facilitate payment of our fees from clients’ accounts
- Assist with back-office functions, recordkeeping, and client reporting



**Services That Generally Benefit Only Us.** SSG also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefit providers, human capital consultants, and insurance providers

SSG may provide some of these services itself. In other cases, it will arrange for third-party vendor provide these services to us. SSG may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. SSG may also provide us with other benefits, such as occasional business entertainment of our personnel. As noted above, SSG does allow clients to direct brokerage in certain situations; however, St. Croix Advisors, LLC cannot guarantee the best execution of client transactions. As a result, directing brokerage may cost the client more money.

St. Croix Advisors, LLC does not aggregate the purchase or sale of securities. Typically, St. Croix Advisors, LLC is purchasing mutual funds inside client accounts so there is not a cost-benefit to aggregating. St. Croix Advisors, LLC does not have any formal arrangements to utilize research, research-related products or other services from broker-dealers, or other third parties.

### **Item 13 – Review of Accounts**

Financial Planning Review Procedure:

St. Croix Advisors, LLC financial planning clients, recommends annual review meetings but can elect to meet as needed. Review meetings entail discussions around client's financial goals and objectives, address changes from our previous meeting, cash flow, wealth management strategies, investments, risk management, assets, liabilities, and potentially any other items pertaining to their circumstances.

Investment Management Review Procedure:

For those clients who receive Investment Management services directly from St. Croix Advisors, LLC, we monitor your portfolio on a continuous basis. SCA recommends investment advisory clients meet at least annually to review the last year and make

recommendations and to discuss the impact of any changes in your portfolio or financial situation.

**Selection of Investment Advisory Services Procedure:**

For those clients to whom an outside Investment Manager or Registered Investment Advisory Firm, those independent firms provide investment supervisory services, account reviews are conducted on an ongoing basis by their own Principals and/or Associated Persons. Clients will be contacted at least annually and should contact us in the event their financial situation has changed.

**Item 14 – Clients Referrals and Other Compensation**

SCA does receive client referrals from unaffiliated and affiliated solicitors. SCA may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid from SCA's investment management, financial planning fee or commission received on insurance products, and may or may not result in an additional cost to the client. If the client is introduced to SCA by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of SCA's written disclosure statement as same is set forth on Part II of form ADV, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between SCA and the solicitor, including the compensation to be received by the solicitor from SCA. Any affiliated solicitor of SCA shall disclose the nature of his/her relationship to prospective clients at the time of the solicitation.

St. Croix Advisors may recommend certain types of insurance to be implemented as part of a plan; however, St. Croix Advisors is insurance licensed and would receive a commission for the sale of insurance products.

St. Croix Advisors, LLC may receive an economic benefit from SSG in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at SSG. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of SSG's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

St. Croix Advisors, LLC receives an economic benefit from insurance brokers in the form of product, services, and education made available to us and other independent insurance professionals.

### **Item 15 – Custody**

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct a custodian to deduct our advisory fees directly from your account or if you grant us the authority to move your money to another person's account. Third-party custodians maintain actual custody of your assets. You will receive account statements directly from those providers at least quarterly. They will be sent to the email or postal mailing address you provided to them. You should carefully review those statements promptly when you receive them. We also urge you to compare your account statements to the quarterly performance reports you may receive from us. Advisors are not affiliated with custodians. The custodians do not supervise the advisor, its agents or activities.

### **Item 16 – Investment Discretion**

St. Croix Advisors, LLC recommends equity, fixed income, exchange-traded funds and mutual fund investments, underwritten investment management agreements, which include discretionary authority. Such discretionary authority, together with limited powers of attorney executed by St. Croix Advisors, LLC clients, allows St. Croix Advisors, LLC consultants to determine, without specific client consent, (1) the securities to be purchased or sold, (2) the amount of securities to be bought or sold, (3) the commissions to be paid for each transaction processed. Clients may limit or amend St. Croix Advisors, LLC discretionary authority by making a written request. While there are no other express limitations on the authority described, St. Croix Advisors, LLC requires prior written discretionary authority from its clients in the form of a contract. St. Croix Advisors, LLC has clients over whom it does not have discretionary authority. Typically, these clients are a corporate pension, 401(K) and profit-sharing plans. The individuals participating in these plans can give St. Croix Advisors, LLC discretionary authority over their assets inside the plan by signing a contract.

### **Item 17 – Voting Proxies on Client Securities**

St. Croix Advisors, LLC does not have authority to cast proxy votes on securities maintained in your accounts. We may provide assistance, but are not obligated to do so, with a particular proxy voting matter at your request.

**Item 18 – Financial Information**

St. Croix Advisors, LLC does not require pre-payment of fees six months in advance and is not required to disclose certain information related to our financial condition. We have no information to disclose related to any financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and have not been the subject of a bankruptcy proceeding.

**Item 19 – Requirements for State-Registered Advisers**

- A) Brett Anderson, born 1969, graduated from Augsburg College in 1991 with a Bachelor's degree, holds Certified Financial Planner (CFP®) designation, Chartered Financial Consultant (ChFC®) and Chartered Life Underwriter (CLU®) from the American College, founded St. Croix Advisors, LLC in 2010 to present. Prior was an independent Financial Advisor for Northwestern Mutual from 2001 to 2010.
- B) Outside business activities have been previously disclosed above.
- C) We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).
- D) Neither Brett Anderson nor St. Croix Advisors, LLC have been subject to any arbitration claims.