

CLEAR BROOK ADVISORS, INC.  
FORM CRS – CUSTOMER RELATIONSHIP SUMMARY  
March 2024

<p><b>Item 1.</b> <b><u>Introduction</u></b></p>	<p>Clear Brook Advisors, Inc. (“CBA”) is registered as an investment advisor with the SEC. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. We only provide investment advisory services and do not provide brokerage services.</p> <p>You can access some free and simple tools that are available to research firms and financial professionals at <a href="https://Investor.gov/CRS">Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisors, and investing. Additional information on CBA can be obtained at the SEC public disclosure website (<a href="https://adviserinfo.sec.gov/">https://adviserinfo.sec.gov/</a>) by inserting our full name (Clear Brook Advisors, Inc.) or inserting our IARD number which is SEC File# 801-66918.</p>
<p><b>Item 2.</b> <b><u>Relationships and Services</u></b></p>	<p><b>What investment services and advice can you provide me?</b> We offer investment advisory services to high net worth retail investors with respect to private investment partnerships, including but not limited to investments in leveraged buyouts, growth equity, venture capital, real estate, agriculture, energy and fixed income and distressed asset strategies. In addition, in limited cases, we provide advice on investing in listed equity securities, mutual funds and ETFs.</p> <p><b>Investment Authority and Custody</b> We do not sponsor or sell financial products. We offer advice on a non-discretionary basis; we recommend individual investments or securities, however, our clients make the decision regarding the purchase or sale. We do not take custody of assets, nor do we provide administrative services. However, in certain limited circumstances, we will serve as a trustee for a client trust, in which case we are deemed to have investment discretion and custody of assets in the trust.</p> <p><b>Monitoring</b> In instances where our clients have invested in a partnership or security (including ETFs and mutual funds), we regularly monitor the investment performance and, when appropriate, discuss these investments with our clients.</p> <p><b>Account Minimums and Other Requirements</b> We have no formal investment minimums for our services. In general, the minimum investment for the investments that we research and recommend is \$1.0 million or more, and the investor must be an accredited investor or qualified purchaser. Additional information on whether one is an accredited investor under Rule 501 Regulation D can be found <a href="https://www.sec.gov/fast-answers/answers-accredhtm.html">https://www.sec.gov/fast-answers/answers-accredhtm.html</a>.</p> <p><b>More Additional information</b> about CBA is available on Part 2 of our Form ADV, which is available at <a href="https://clearbrookadvisors.com/form-adv/">https://clearbrookadvisors.com/form-adv/</a>.</p> <p><b>Conversation Starters.</b> Ask your financial professional—</p> <ul style="list-style-type: none"><li>▪ <b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li><li>▪ <b>How will you choose investments to recommend to me?</b></li><li>▪ <b>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</b></li></ul>
<p><b>Item 3.</b> <b><u>Fees, Costs, Conflicts, and Standard of Conduct</u></b></p>	<p><b>What fees will I pay?</b> We charge our clients one of two ways: a fixed annual retainer for investment advice, or a fee which is set as a percent of net asset value of the client’s investments recommended by CBA. This fee is negotiated with each client in advance and set forth in the investment advisory agreement. We do not receive any commissions or compensation from third-parties. Generally, fees are charged and due quarterly. For clients that are charged on a percent of net assets, the account values are calculated at the start either quarterly or semi-annually. In those cases, this fee will increase the more investments the client makes with us and as the value of the investment increases; we have an incentive to encourage our clients to increase the amount they invest in assets on which we advise.</p> <p>In addition to fees paid to CBA, clients pay management and incentive fees to the sponsors of the private investment funds that we recommend. For public securities, our clients will bear transaction fees when they buy or sell investments. Clients also pay fees to the broker-dealer or banks with whom they maintain an</p>

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	<p>account. We sometimes select and recommend mutual funds and exchange traded funds for a portion of clients' portfolios. Such investment vehicles pay their own management, transaction, and administrative fees and expenses, and those fees and expenses are indirectly borne by the investors in those vehicles, including our clients.</p> <p><b>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.</b></p> <p>Additional information about our firm's fees are included in Item 5 of Part 2 of Form ADV, available at <a href="https://clearbrookadvisors.com/form-adv/">https://clearbrookadvisors.com/form-adv/</a>.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"><li>▪ <b>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?</b></li></ul>
<p><b>Item 3.</b> <b><u>Fees, Costs, Conflicts, and Standard of Conduct</u></b></p>	<p><b>What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?</b></p> <p><i>When we act as your investment advisor</i>, 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 to you. Here are some examples to help you understand what this means.</p> <ul style="list-style-type: none"><li>▪ We manage accounts for multiple clients, and we allocate our time based on each client's needs. Our firm earns more as we expand our client base and grow our assets under management, and we seek to balance our staffing with the individualized needs of each client.</li></ul> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"><li>▪ <b>How might your conflicts of interest affect me, and how will you address them?</b></li></ul> <p><b>More Additional information</b> about conflicts of interest between CBA's and its clients is available on Part 2 of our Form ADV, which is available at <a href="https://clearbrookadvisors.com/form-adv/">https://clearbrookadvisors.com/form-adv/</a>.</p> <p><b>How do your financial professionals make money?</b> CBA's financial professionals receive a salary and may receive a discretionary bonus. Compensation is set with the intention of attracting and retaining highly qualified professionals. Compensation is based on a variety of factors, including the experience of the professional, the work product of the professional, the ability to generate new business and to service existing clients.</p>
<p><b>Item 4.</b> <b><u>Disciplinary History</u></b></p>	<p><b>Do you or your financial professionals have legal or disciplinary history?</b> None of CBA's financial professionals have a legal or disciplinary history.</p> <p>Visit <a href="https://investor.gov/CRS">Investor.gov/CRS</a> for a free and simple search tool to research CBA and our financial professionals.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"><li>▪ <b>As a financial professional, do you have any disciplinary history? For what type of conduct?</b></li></ul>
<p><b>Item 5.</b> <b><u>Additional Information</u></b></p>	<p><b>Additional information about our services</b> can be found at <a href="https://clearbrookadvisors.com/form-adv/">https://clearbrookadvisors.com/form-adv/</a>. If you have any questions about the contents of this brochure or would like to request a copy of this relationship summary, please contact C. Kenneth Strachan, Managing Director, at (617) 315-8979.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <ul style="list-style-type: none"><li>▪ <b>Who is my primary contact person? Is he or she a representative of an investment-advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?</b></li></ul>