

# FORM ADV Part 3: Form CRS

## Relationship Summary

DATE: June 30, 2023

### Introduction

Burford Brothers, Inc. (“Burford Brothers,” “we,” “us,” “our”) is a registered investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, which is why it is important for you to understand the differences.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing

### Relationships and Services

#### What Investment Services and Advice Can You Provide Me?

We offer investment advisory services to retail investors.

Asset Management Services: When providing these services on a discretionary basis, we will manage your assets while we continuously monitor your custodial accounts and provide you with continuous and ongoing supervision of your custodial accounts. When discretionary authority is granted via execution of our investment advisory agreement, we will have the limited authority to determine the type and number of securities to be purchased or sold for your portfolio without obtaining your consent for each transaction. For non-discretionary asset monitoring services, you make the ultimate decision regarding the purchase or sale of investments. We may provide such services through our wrap fee program, or we may recommend the use of third-party managers.

Burford Brothers also offers eligible clients the opportunity to invest in cryptocurrency through an investment account offered by an unaffiliated entity. Accounts holding cryptocurrency assets can either be managed by Burford Brothers or managed solely by you. The cryptocurrency assets held in client accounts that are managed by Burford Brothers are monitored at least on a quarterly basis.

You may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth. We offer advice with respect to various products and types of investments. We do not have a minimum account size for our asset management services; however, our minimum fee is 0.40% of assets under management.

For additional information, please see Items 4 and 7 of Part 2A and Items 4.A and 5 of Part 2A Appendix 1.

- 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?

### Fees, Costs, Conflicts, and Standard of Conduct

#### What Fees Will I Pay?

For asset management services, you will pay an annual fee based on the total assets under management. The fee is payable monthly in arrears. When a third-party manager is utilized, the fees from each third-party adviser selected for you will be based on a percentage of the assets they manage and will vary depending on the adviser, the amount of assets invested, and specific fee negotiated between us and each third-party adviser. We will receive a share of the total fee charged to you.

We charge an asset-based fee which means that the more assets there are in the clients’ advisory account, the more the client will pay in fees. As such, we may therefore have an incentive to encourage our clients to increase the assets in his or her accounts. You may pay additional fees, including custodian fees, fees related to mutual funds, and other transactional fees. Asset-based fees associated with the wrap fee program will include most transaction costs and fees to a broker-dealer that has custody of these assets and therefore are typically higher than a typical asset-based advisory fee.

Clients that have a cryptocurrency account will pay transaction fees for each transaction and an asset-based custody fee with respect to the cryptocurrency assets held in these accounts, in addition to the overall management fees paid to Burford Brothers that are described herein.

We receive compensation in the form of asset-based fees on the asset that are held in a Flourish Crypto account. This creates a conflict of interest because it incentivizes us to recommend that you place cryptocurrency trades in your Flourish Crypto account rather than in a different third-party account.

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. For additional information regarding our fees and costs, please see Item 5 of Form ADV and Item 5 of Part 2A Appendix 1.

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.

Our asset management fee structure gives us the incentive to encourage clients to increase their assets in their accounts. Our firm's financial professionals include licensed insurance agents. In this capacity, our financial professionals may sell insurance products for a commission. They have an incentive to recommend these products to you in order to increase their compensation.

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

For additional information, please see Items 5 and 10 of Part 2A and Item 9 of Part 2A Appendix 1.

### **How Do Your Financial Professionals Make Money?**

Our financial professionals are paid cash compensation as a salary plus bonuses based on their experience and roles.

### **Disciplinary History**

#### **Do You or Your Financial Professionals Have Legal or Disciplinary History?**

Yes. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research you and your financial professionals.

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

### **Additional Information**

For additional information about our services and to request a copy of the current Form ADV Part 3 Form CRS, please visit our website at [www.burfordadvisors.com](http://www.burfordadvisors.com) or call us at 214-523-2333.

- 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?

**This is a Summary of Material Changes to our Form CRS, which describes the material changes since our Form CRS was originally filed on June 17, 2020.**

*Material Changes on February 3, 2022:*

1. We added the following disclosure to “What investment services and advice can you provide me?” on page 1 of our Form CRS:

**“Burford Brothers also offers eligible clients the opportunity to invest in cryptocurrency through an investment account offered by an unaffiliated entity. Burford Brothers also offers eligible clients the opportunity to invest in cryptocurrency through an investment account offered by an unaffiliated entity. Accounts holding cryptocurrency assets can either be managed by Burford Brothers or managed solely by you. The cryptocurrency assets held in client accounts that are managed by Burford Brothers are monitored at least on a quarterly basis.”**

2. We also added the following disclosure to “What fees will I pay?” on page 1 of our Form CRS:

**“Clients that have a cryptocurrency account will pay transaction fees for each transaction and an asset-based custody fee with respect to the cryptocurrency assets held in these accounts, in addition to the overall management fees paid to Burford Brothers that are described herein.”**

3. Additional disclosure was included in “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?” on page 1 of our Form CRS:

**“We receive compensation in the form of asset-based fees on the asset that are held in a Flourish Crypto account. This creates a conflict of interest because it incentivizes us to recommend that you place cryptocurrency trades in your Flourish Crypto account rather than in a different third-party account. “**