



CUSTOMER RELATIONSHIP SUMMARY

Creative Financial Designs, Inc. ("Creative") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Additionally, Creative operates under the name Creative Portfolio Management.

cfd Investments, Inc. ("CFDI") is registered with the SEC as a broker-dealer and is a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC").

Creative and CFDI are affiliated entities, collectively referred to as the "CFD Companies."

Broker-dealer and investment advisory services, along with their associated fees, vary significantly. It is essential for you, as a retail investor, to understand these differences. To assist in your research, free and straightforward tools are available at Investor.gov/crs. This resource also offers educational materials on broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Your Financial Professional ("FP") may offer a wide variety of brokerage, and/or advisory services, depending on each FP's registrations. The CFD Companies encourage you to ask your FP whether any investment limitations or account requirements apply. If both brokerage and advisory services are offered, your FP will inform you when a recommendation or advice is part of a brokerage or advisory service.

Brokerage Services – through CFDI

Financial Professionals ("FPs") associated with CFDI may offer brokerage services to you. Some features are discussed below.

- Brokerage services include executing your orders and investment transactions, as well as making recommendations for buying, selling, or holding investments.
- FPs may make specific recommendations; however, FPs do not have investment discretion. You will make all final decisions for your account.
- Brokerage services may include a wide variety of product and product types.
- Additionally, FPs may offer certain insurance-based products, such as variable or indexed annuities and variable life products.
- Brokerage services do not include investment or account monitoring.
- CFDI does not create its own investment products or offer any proprietary products.

For additional information about CFDI's brokerage services, please refer to CFDI's Conflicts of Interest Disclosure and other applicable documents at cfdinvestments.com/disclosures.

Investment Advisory Services – through Creative

Financial Professionals associated with Creative may offer advisory services to you. Some features are discussed below.

- Creative provides services in connection with advisory accounts and financial planning.
- Creative provides discretionary and non-discretionary advisory accounts with a broad range of strategies utilizing various platforms.
- For discretionary accounts, you grant Creative authority to buy and sell investments in your account. You may request reasonable restrictions subject to certain limitations.
- Creative provides monitoring for discretionary accounts and investments. Creative does not offer monitoring for non-discretionary accounts or investments.
- Creative provides planning services which can include comprehensive, modular, ad hoc, hourly, or retainer-based services.
- Creative does not offer wrap fee programs; however, some third-party managers do.
- Advisory accounts are subject to account limits, including minimum account values typically set at \$25,000, though both higher and lower minimum values apply.

For additional and detailed information about Creative's services, please refer to Creative's Form ADV, Part 2A Brochure (Items 4 and 7 of Part 2A) creativefinancialdesigns.com/disclosures.

» **Questions to ask your Professional:**

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?

What fees will I pay?

Brokerage Services Expenses – through CFDI

You typically pay transaction-based expenses, such as commissions, sales charges, markups, markdowns, concessions, custodial, and product expenses. These expenses differ by product, product type and custodian. The amount you pay as a transaction-based expense varies according to the particular investment and amount invested.

The more transactions you make and the higher the value of the transactions, the more income we earn. This creates an incentive to encourage you to conduct more transactions.

For most investments held through NFS, the transaction-based expense is usually charged as a separate commission or sales charge. For bond purchases, this expense is typically included as part of the price you pay for the bond, known as a markup or markdown.

On direct-way transactions in mutual funds and other non-insurance-based direct-way products, a commission is charged on new deposits into your account. For direct-way insurance-based products, you will generally not pay a commission on transactions. Instead, the insurance company pays a concession to CFDI for purchases and new deposits.

Additional costs and fees apply and vary based upon product, product type, and custodian, and may include:

- internal product expenses, including any 12b-1 fees
- account maintenance fees
- paper statement delivery fees
- insurance expenses
- custodial fees and related expenses
- other transactional and product level fees

Investment Advisory Fees – through Creative

You pay for the advisory services you select and these fees vary based on the services selected.

With respect to discretionary and non-discretionary advisory accounts, Creative generally charges an advisory fee based on the account's aggregate assets. In most cases additional fees apply based on the custodian and products held in the account. Common additional fees may include:

- internal product expenses, including any 12b-1 fees
- account maintenance fees
- paper statement delivery fees
- insurance expenses
- custodial fees and related expenses
- other transactional and product level fees

Third-party asset managers have their own fee structures, which vary based on the manager, platform, custodian, and other factors.

Generally, the more assets you retain in an advisory account, the more fees you will pay. This creates an incentive to encourage you to maintain higher account balances.

Financial planning fees are charged on a fixed, retainer, hourly, or otherwise agreed-upon basis. Planning fees are based on the services provided. The more services provided the more fees you are charged. This creates an incentive to offer you more services.

Fees for Creative are negotiable.

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 about CFDI's transaction fees and costs, refer to applicable disclosure documents available on CFDI's website at fdinvestments.com/disclosures. For additional information about Creative's fees and costs, refer to Creative's Form ADV, Part 2A Brochure (Item 5) and other applicable disclosures at creativefinancialdesigns.com/disclosures.

» **Questions to ask your 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 providing recommendations as my broker-dealer or acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you. Here are some examples to help you understand what this means.

We receive general compensation directly from you or indirectly through third parties, for the investment advice we provide or for the securities we sell. CFDI receives compensation in the form of ticket charges, commissions, concessions, markups or markdowns, and other compensation based on transactions conducted on your behalf. Generally, the more transactions you conduct and the larger those transactions are, the more income CFDI receives. Therefore, CFDI and your FP have an incentive to recommend more and larger transactions to increase revenue.

Creative receives compensation through asset-based fees that you pay for advisory services. This fee is based on the amount of assets in your account. The more assets you have in your account, the more income Creative receives. This creates an incentive for Creative and your FP to recommend that you deposit and maintain larger sums of assets in your account. Planning fees are based on the services provided. The more services provided the more fees you are charged. This creates an incentive to offer you more services.

We also receive third-party payments as income from corporate sponsorships. This revenue can be flat or based on a revenue share arrangement. Corporate sponsors provide these funds in order to market to our financial professionals and to encourage more sales of their products. This may influence the recommendation of certain products, or maintaining assets with particular third parties. Additionally some third parties offer cash or non-cash incentives to FPs. The CFD Companies and FPs have an incentive to recommend products or services provided by corporate sponsors.

With respect to accounts maintained through National Financial Services (NFS), CFDI receives revenue in connection with the use of money market sweeps and bank deposit sweep programs. When uninvested cash is maintained in your account, by default it is placed into a bank deposit sweep program. Such funds are FDIC insured. CFDI and NFS are involved in the determination of your interest rate, which affects the income of CFDI. The interest rate on these deposits will differ from and may be significantly lower than other cash investment options. Though the bank deposit sweep program is the default option, you may select other cash-based investment options, some of which also provide CFDI additional compensation. Because CFDI receives income through these sweep programs, there is an incentive to keep a higher cash balance in your account.

» Questions to ask your Professional:

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

The CFD Companies recognize these and other conflicts of interest and actively manage them to mitigate their effects. For additional information about Creative's and CFDI's conflicts of interest, corporate sponsors, and other firm disclosure and information, please refer to Creative's Form ADV, Part 2A Brochure at creativefinancialdesigns.com/disclosures and the Conflicts of Interest Disclosure and additional disclosures at cdfinvestments.com/disclosures.

How do your financial professionals make money?

Our Financial Professionals operate as independent contractors, and their compensation is outlined in agreements between them and the CFD Companies. Those who provide investment advisory services receive a portion of the advisory fee you pay. FPs who provide you brokerage services receive a portion of the concessions, commissions, or markups and markdowns from your trades.

FP compensation is based on total production, including payments based on the amount of client assets they service and the products they sell. In addition, our FPs receive various levels of compensation for selling different types of investments or services. This could include a share of the 12b-1 fees, trail payments, or sales loads paid by an investment product.

FP compensation through CFDI and Creative differs based on the products or services provided. This creates an incentive for FPs to offer certain products or services.

When an FP moves to the CFD Companies from another firm, we may offer support such as forgivable loans, non-monetary transition assistance, or reduced costs associated with the transition. This provides an incentive for the FP to migrate and maintain business with the CFD Companies.

FPs may also receive non-cash compensation from the CFD Companies or third parties. Non-cash compensation may include: discounted or free attendance of training events, gifts and entertainment, free or reduced fees for technology and other services, and marketing support.

We acknowledge that the compensation structure for our FPs can create conflicts of interest. However, we require our FPs to act in your best interest and not prioritize their own. To manage and mitigate these conflicts, we have implemented systems designed to ensure that the advice and services provided by our FPs are aligned with your needs and goals.

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

Yes. Please refer to [Investor.gov/crs](https://investor.gov/crs) for free and simple search tools to research us and our FPs.

» Questions to ask your Professional:

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

Additional Information

You can obtain additional information about our brokerage or investment advisory services at creativefinancialdesigns.com and at cfdinvestments.com/investors. To request additional up-to-date information or to request a copy of our CRS, please call 1-800-745-7776.

» Questions to ask your 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?