

The Holben Group, LLC is registered with the Securities and Exchange Commission as an Investment Adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences.

This document summarizes our company, services and fees and will allow you to compare our offerings to other Investments Advisers and/or Brokers. You can find more detailed information on our company at www.theholbengroup.com or on our Form ADV [ADV-03-2024.pdf](#).

Free and simple tools are available to research firms and financial professionals at <http://www.investor.gov/CRS> which also provides educational materials about broker-deals, investment advisers and investing.

What investment services and advice can you provide me?

We offer customized investment management services to retail investors, families, and related entities (trusts, etc.). Our services include:

Investment and Wealth Management

- Investment allocation design and implementation
- Risk tolerance measurement & consultation
- Portfolio rebalancing
- Regular monitoring and reporting

Financial Planning & Advisory Services

- Retirement Planning & Modeling
- Cash Flow planning
- Estate Planning Advice & Consultation
- Philanthropic Planning
- Insurance Review & Planning

We manage your investment accounts on a discretionary basis which means we decide which investments to buy and sell in your account. You can limit our discretionary authority by providing us with your restrictions and guidelines in writing.

In our investment process we use one or a mix of the following types of investments: stocks, bonds, mutual funds, exchange traded funds (ETFs), US Government Securities, CDs, REITS and other types of investments we deem appropriate for your account. We monitor and report on your investments on a regular basis.

We generally require a minimum investment of \$500,000 for our services. However, at our discretion, this minimum may be waived.

Your investments will be maintained at a third-party custodian: Charles Schwab, TIAA and/or Fidelity.

Conversation Starters

- 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?

<p><i>What fees will I pay?</i></p>	<p>You will pay us a fee based on the value of your account. These fees are paid quarterly, in advance. In certain, pre-arranged situations we may charge for financial planning services on an hourly or fixed fee basis.</p> <p>Additional expenses you pay include: Charges from your custodian including transaction fees and/or account maintenance fees and expenses and costs related to mutual funds, exchange traded funds (ETFs) or other product related fees.</p> <p><i>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.</i></p>	<ul style="list-style-type: none"> • 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?
<p><i>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?</i></p>	<p><i>When we act as your investment adviser</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 you. Here is an example to help you understand what this means:</p> <p>Our fee revenue increases as your assets under management increase. This means that we have an incentive to increase the value of your account(s). We manage any conflicts that arise by being transparent, requiring disclosures when appropriate and following procedures that ensure we are working in your best interest.</p>	<ul style="list-style-type: none"> • How might your conflicts of interest affect me and how will you address them?
<p><i>How do your financial professionals make money?</i></p>	<p>Our financial professionals are paid a salary based on firm-wide fee income. This causes a conflict of interest because our professionals are incentivized to increase the value of the assets we manage for you.</p>	
<p><i>Do you or your financial professionals have legal or disciplinary history?</i></p>	<p>No. You can visit http://www.investor.gov/CRS for a free and simple search tool to research our firm and financial professionals.</p>	<ul style="list-style-type: none"> • As a financial professional, do you have any disciplinary history? For what type of conduct?
<p><i>Additional Information</i></p>	<p>Your financial professional will be your primary contact person at our firm. All our financial professionals are licensed, Investment Advisor Representatives of our firm.</p> <p>If you have any concerns or would like a paper copy of this summary, you may contact Jeff Holben at 303.691.1970 or jeff@theholbengroup.com</p> <p>You can visit our website at www.theholbengroup.com. A copy of our Form ADV can be found at ADV-03-2024.pdf</p>	<ul style="list-style-type: none"> • Who is my primary contact person? Is he or she a representative of an investment adviser? Who can I talk to if I have concerns about how this person is treating me?