

GenTrust, LLC
Client Relationship Summary
March 1st, 2021 (Current as of March 2023)

1. Introduction

Our name is GenTrust, LLC (“Adviser”, “GenTrust”, “we”, “us”, “our”). We are registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

2. Relationships and Services

A. What investment services and advice can you provide me?

B. Description of Services. GenTrust offers a full range of wealth management, investment management, financial planning, consulting, and concierge services to our clients which include high net worth individuals and families, family offices, small businesses, and other organizations. These services are tailored to your needs and take into consideration your risk profile which we determine during meetings we hold with you about your financial goals and needs. Clients may also engage GenTrust to manage all or a portion of their assets and we may recommend independent investment managers (“Independent Managers”), when appropriate, to manage all or a portion of your assets. When recommending an Independent Manager for you, GenTrust reviews information about the Independent Manager, such as descriptions of the Independent Manager’s investment strategies, past performance, and risk results, to the extent available.

- (i) **Monitoring:** GenTrust consults with you initially and periodically to determine risk tolerance, time horizon, and other factors that can impact your investment needs and together with you, select an appropriate investment plan.
- (ii) **Investment Authority:** We may manage your assets on a discretionary basis, meaning you give us the authority to buy and sell investments on your behalf, or on a non-discretionary basis, meaning we would obtain your consent before executing any trade on your behalf.
- (iii) **Limited Investment Offerings:** We serve as the investment adviser to one or more private funds or special purpose vehicles (“SPVs”), which are established to facilitate clients’ investments in private companies or other limited offerings.
- (iv) **Account Minimums and Other Requirements:** We require a minimum account size of \$10 million, but we may waive the minimum at our discretion. We do not have requirements for you to open and maintain accounts at specific brokers.

C. 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?**

D. Additional Information: Please see the more detailed disclosure on the investment services and advice that we can provide to you in Items 4 and 7 of our Form ADV Part 2A which is available at the Internet address below: https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=829800 (“Brochure Link”)

3. Fees, Costs, Conflicts, and Standard of Conduct

A. What fees will I pay?

- (i) **Description of Principal Fees and Costs:** We offer services on a fee basis, which may include fixed fees, fees based upon assets under management and/or the performance of a client’s portfolio, as indicated on your client agreement. We provide investment management services for an annual fee of up to 1.50%, billed quarterly on a pro-rata basis. These fees are negotiable at the sole discretion of GenTrust. To the extent it is not included as part of the investment management service agreement, we may charge you a fixed fee for financial planning, reporting, and consulting services. These fees are negotiable, but generally range from \$1,000 to \$100,000 per quarter, depending upon the level and scope of the financial planning and/or the consulting services we provide to you. Your annual fees do not include brokerage commissions, transaction fees, and other related costs and expenses that may be incurred when managing your account(s).
- (ii) **Description of Other Fees and Costs:** Clients may incur certain charges imposed by the Financial Institutions and other third parties such as fees charged by independent investment managers (“Independent Managers”), custodial fees, charges imposed directly by a mutual fund or ETF, deferred sales charges, odd-lot differentials, trade away

fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions

- (iii) ***Additional Information: 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.*** We offer services on a fee basis, which may include fixed fees as well as fees based upon assets under management and/or the performance of a client's portfolio. Please make sure you understand what fees and costs you are paying and see the more detailed disclosure on our fees and costs in Item 5 of our Form ADV Part 2A, which is available through the Brochure Link.

(iv) ***Conversation Starters:***

- **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. 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) ***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.
- (ii) ***Examples of Ways We Make Money and Conflicts of Interest:*** GenTrust has an affiliation with Catenary Alternative Asset Management, LLC ("CAAM"), a registered investment adviser to private funds and managed accounts. CAAM shares office space, management, supervisory and administrative personnel as well as portfolio managers. Although GenTrust does not receive compensation from CAAM for recommending that clients invest in CAAM's private funds or managed accounts, this poses a conflict for GenTrust because certain owners of GenTrust are also owners of CAAM, and therefore, they receive economic benefit from fees charged by CAAM to a GenTrust investor.

One of GenTrust's Supervised Persons providing investment advice on behalf of our firm is licensed as an insurance broker and may earn commission-based compensation for selling insurance products, including insurance products sold to GenTrust clients. A portion of the commissions earned by this insurance broker is paid to GenTrust. To mitigate this conflict, we endeavor at all times to place our clients' interests first when making recommendations regarding insurance and investments and each client who desires to purchase a commission-generating insurance product is provided an insurance disclosure statement and must acknowledge such receipt. Additionally, we assign you a dedicated Financial Advisor who is responsible for ensuring that your investment goals are being executed and re-evaluated periodically.

(iii) ***Conversation Starters:***

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

C. How do your financial professionals make money? Our financial professionals have various compensation packages including: (1) base salary and bonuses based on a percentage of fee revenue for accounts they service, (2) a minimum base salary to cover health benefits and payroll costs, in addition to bonuses based on percentage of fee revenue for the accounts they service, and (3) no salary or payroll, but solely a percentage of fee revenue from the clients they service. This payment structure may pose a conflict of interest; however, we mitigate this potential conflict by ensuring that our financial professionals put all of our clients' interests ahead of their own. Your Financial Advisor is responsible for ensuring that your investment goals are being executed and re-evaluated periodically.

4. Disciplinary History

A. Do you or your financial professionals have legal or disciplinary history? No, neither GenTrust nor any of our financial professionals has a legal or disciplinary history.

- (i) Please visit www.Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

(ii) ***Conversation Starters:***

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

5. Additional Information

A. You can find additional information about our investment advisory services on the SEC's website and on our website. Our website is: <https://gentrustwm.com/>.

B. You can request up to date information and a copy of our relationship summary by contacting us at 305-677-6688 or e-mail info@gentrustwm.com.

C. *Conversation Starter:*

- **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?**