

Item 1. Introduction – Independence Asset Advisors, LLC, is an independent, employee-owned investment management firm, registered with the Securities and Exchange Commission as an investment adviser under the Investment Advisers Act of 1940. We provide investment advisory services but do not provide brokerage services. It is important for you to understand the differences between investment advisers and broker-dealers, including the difference in fees. **How can I find out more about financial professionals and Form CRS?** The SEC offers help at www.investor.gov/CRS. This website provides free and simple tools to allow you to research firms and financial professionals. You can also find educational materials about investment professionals and investing.

Item 2. What investment services and advice can you provide me? We are a fee only advisor and offer outsourced chief investment officer services, investment advisory services, and portfolio management services to institutional clients, individual clients deemed to be Qualified Purchasers, and High Net Worth clients. We manage your portfolio consistent with your investment policy statement. We use strategies consisting of individual stocks, bonds, mutual funds, exchange traded funds, alternative investments, and other investment managers to help us meet your objectives. Effective implementation and execution of our recommendations is an essential part of our service to you. We use different brokers to provide custody and execution of your transactions.

Monitoring – Regular account reviews are conducted monthly and quarterly and cover cash, compliance with your investment objectives and/or investment policy, as well as the appropriateness of investments used to meet your objectives. We will also conduct portfolio reviews to evaluate performance, diversification, and risk levels. We will review fund managers, institutional money managers or separate account managers to evaluate their performance on an absolute basis and relative to other managers. Assets are held by your custodian. They will provide you with statements on at least a quarterly basis.

Investment authority – We only accept discretionary accounts. Discretionary authority allows us to execute buy and sell decisions, determine which fund managers, institutional managers, and separate account managers to consider, and to determine the appropriate portfolio allocations consistent with your investment strategy, all without your advance approval.

Limited investment offerings – We offer tailored investment management services to each of our clients. Portfolios can be customized. We can construct portfolios in most any fashion you wish ranging from very conservative to aggressive growth. For any portfolio we manage, our investment authority may be subject to specific investment objectives, and/or other conditions and restrictions imposed by you. For separate accounts, you may enter into that agreement directly with the separate account manager. Other firms may offer equivalent services that are more diversified, provide less risk, or have lower fees.

Account minimums and other requirements – We do not impose a strict minimum account size when you begin working with us. Instead we generally require a minimum annual fee of \$120,000. We will consider all aspects of our client relationship when accepting new accounts. Our standard fee ranges from .10% to .50% in accordance with stated account sizes subject to the minimum fee requirement.

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

What fees will I pay? We encourage you to speak with us about fees. Generally, we charge an annual fee of .10% (10 bps) to .50% (50 bps) based on the assets we manage on your behalf. Fees may be negotiable on a client-by-client basis depending on several factors. The specific annual fee schedule is identified in your Investment Management Agreement. Except for several legacy clients, we calculate the fee quarterly in arrears. We generally require a \$120,000 minimum annual fee. We do not receive any commissions. We will never raise your fees unless agreed upon in writing and made a part of our agreement with you. The assets on which we bill include securities, cash, assets with institutional managers, and separate account managers as valued by your custodian.

There may be additional fees charged to you such as custodian fees, account maintenance fees, fees related to mutual funds and ETFs, institutional manager, and separate account manager fees and other transactional and product-level fees. We do not receive any portion of these fees. We do not sponsor any wrap programs.

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.

When we act as your investment advisor, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide. Here are some examples of conflicts of interest you might encounter when choosing your investment advisor.

- An advisor can take a position in an investment prior to recommending that investment to you
- An advisor can recommend its own services when others are equally capable
- An advisor can favor a larger client who generates higher total fees

How might your conflicts of interest affect me, and how will you address them? Please refer to our Form ADV Part 2A to learn more about conflicts of interest. You can see options to access our ADV Part 2A in Item 5 below.

How do your financial professionals make money? Our financial professionals receive a salary and discretionary bonus opportunity. Bonuses, if paid, are determined by our President and Managing Director based on firm and individual performance. Our financial professionals are not paid based on the amount of your assets they service, the time and complexity of your needs, or the investment options they recommend. Our financial professionals do not receive sales commissions of any kind. We believe this structure allows us to operate in the best interest of our clients.

Item 4. Do you or your financial professionals have legal or disciplinary history? We have no legal or disciplinary events to disclose. We encourage you to visit www.investor.gov/CRS for a free and simple tool to research your financial professionals.

Item 5. Additional information – Form ADV Part 1 is used by investment advisors to register with the SEC and state securities authorities. Our ADV Part 2A can provide you with further information about our firm, representatives, services, products, fees, conflicts of interests, and other information about us that you will find useful. You may request a free copy of our ADVs by calling us at 610-649-9841 or visit our website at www.iaadvisors.com. You may also access ADV Part 1, Part 2A, and Part 3 CRS at the SEC’s IAPD website: <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

You may request up-to-date information and a copy of our Form ADV Part 3 CRS - Relationship Summary by using the contact information above. Form CRS or the “Relationship Summary” will be provided at no cost.

Conversation starters – It is prudent to ask questions of financial professionals and to have conversations about relationships and services. Here are some questions to consider asking:

- 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?
- How might your conflicts of interest affect me, and how will you address them?
- As a financial professional, do you have any disciplinary history? And if so, For what type of conduct?
- Who is my primary contact person?
- Is he or she a representative of an investment advisor or broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?
- 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 advisor? How else does your firm make money and what conflicts of interest do you have?
- Who can I talk to if I have concerns about my advisor?