

### Item 1: Introduction

Sequoia Financial Advisors, L.L.C. (“SFA”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an Investment Adviser. Because brokerage and investment advisory services and fees differ, it is important for you, the retail investor, to understand the differences. In addition to this relationship summary, there are free and simple tools available for you to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS). This site also provides educational materials about broker-dealers, investment advisers, and investing.

### Item 2: Relationships and Services. What investment services and advice can you provide me?

We offer investment advisory services to retail investors including investment management, wealth planning and trust support services. We work with you to determine your investment objectives, risk tolerance, and other factors to develop a strategy. This enables us to give you continuous and focused investment advice. Once we construct an investment portfolio for you, we will monitor performance and rebalance your portfolio on an ongoing basis. We generally manage our client accounts on a discretionary basis. If you participate on a discretionary basis, you allow us to manage your account without your approval prior to each transaction. You may limit our discretion by providing our firm with your restrictions and guidelines in writing. If you participate on a non-discretionary basis, we must obtain your approval prior to executing any transactions on your behalf (i.e. the ultimate decision is yours). SFA does not have a minimum account requirement.

SFA also offers wealth planning services based upon an analysis of individual needs and goals. This may include planning surrounding your balance sheet, cash flow needs, risk management, college planning, estate planning, business succession planning, charitable giving, or other topics dependent upon your unique circumstances. Monitoring services are dependent upon our ongoing relationship. Lastly, SFA offers Trust Support Services. This service is explained in detail in our form ADV.

For more detailed information about our services, refer to item 4 of our brochure on our [Form ADV 2A](#).

**CONVERSATION STARTER: Ask your financial professional:**

*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?*

### Item 3: Fees, Costs, Conflicts, and Standards of Conduct. What fees will I pay?

For Investment Management Services, you will be charged an ongoing management fee based on the assets under management in accordance with the fee schedule presented in your client agreement. Fees are negotiable based on factors such as the client’s financial situation and circumstances and the amount of assets under management. When you are charged an asset-based fee, the more assets that are in the account, the more you will pay in fees. This creates an incentive to encourage you to increase the amount of assets invested in these accounts. In addition to the fee(s) above, you will be responsible for certain charges imposed by the custodian and/or broker, including transaction fees, custodian fee (e.g. wire fees), and internal fees related to mutual funds. Other than one private fund, we do not typically charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client). We may recommend an exchange-traded fund where we serve as sub-advisor, which creates a conflict of interest. We may recommend tax preparation services from our affiliate, Sequoia Tax Services, which creates a conflict of interest. These conflicts are further described in our ADV.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, third party investments and other third parties such as fees charged by managers, sub-advisers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds exchange traded funds, hedge funds, private equity funds and other pooled investment vehicles also charge internal management fees, which are disclosed in a fund’s prospectus or other offering materials.

If you are only engaging our wealth planning services, SFA charges a fee for preparing a Plan. This fee is negotiable and is specified in an engagement letter. SFA offers Trustee Support Services. There is a setup fee and ongoing fees. Fees are in addition to investment management fees described above and vary by client based on scope of the engagement, and the complexity of the financial situation, among other factors.

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 our fees, please reference Items 5 and 7 of our Brochure at [Form ADV 2A](#).

***CONVERSATION STARTER: Ask your financial 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 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 firm uses non-directed client commissions (e.g. “soft dollars”) to receive investment related research and services from our custodians. These services provide an incentive to recommend the use of these custodians.
- We have agreements with unaffiliated third parties and our custodians to solicit clients on our behalf. In exchange, we compensate them. Your fees are not increased due to this.
- Our custodians provide benefits related to trading, research, compliance, and marketing amongst others. These services provide an incentive to recommend the use of these custodians
- SFA has an arrangement with an affiliated company to provide insurance solutions. The affiliation creates a conflict as there is a benefit to referring. Clients are under no obligation, contractually or otherwise, to buy insurance products. This is defined in our Form ADV.
- Proprietary Products: We may recommend that you invest assets in a pooled investment vehicle which we manage. One of these vehicles (the ZCA Focus Fund) pay us performance fees from this fund and therefore have an incentive to recommend it to you.
- Third-Party Payments: We do not receive any compensation from third-party issuers or investments.

For additional information about our obligations as an investment adviser and our conflicts, please reference Item 10 of our Firm Brochure at [Form ADV 2A](#).

***CONVERSATION STARTER: Ask your financial professional:***

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

## How do your financial professionals make money?

Our financial professionals are paid a salary plus bonuses based on company, team, and individual performance, which includes metrics like client retention and referrals that is derived from revenue the firm earns from the financial professional’s advisory services and recommendations.

## Item 4: 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 us and our financial professionals.

***CONVERSATION STARTER: Ask your financial professional:***

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

## Item 5: Additional Information

You can find additional information about SFA’s advisory services at our website [www.sequoia-financial.com](http://www.sequoia-financial.com). You can also access the current relationship summary at our site (under disclosures) or you may call us at 1 (888) 225-3777 to request a copy.

***CONVERSATION STARTER: Ask your financial professional:***

*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?*