

**Corundum Group**  
**Client Relationship Summary (CRS)– Form ADV Part 3- March 1, 2024**

**Item 1. Introduction**

Corundum Group, Inc. ("CG") is a registered investment adviser with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to the public in order to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2. Relationship and Services**

What investment services and advice can you provide to me?

CG offers investment advisory services to individuals, high-net-worth individuals, trusts, foundations, and partnerships. Advice is provided through consultation with the client and may include determining financial objectives, identifying financial problems, cash flow management, tax planning support, estate planning support, retirement planning, insurance review, and education funding. CG offers broad asset allocation choices, including equities, fixed income, real estate, and private equity, and may include proprietary products.

**Monitoring:** Investment accounts are monitored at least annually, but reviews can be performed more frequently when market conditions dictate or for changes in tax laws, new investment information, or a client's personal situation. Management, monitoring, and advice are part of CG's standard services.

**Investment Authority:** We offer investment management services on both a discretionary and non-discretionary basis. Clients may place restrictions on our discretionary authority.

**Limited Investment Offering:** We do not limit our investment offerings.

**Account Minimums and Other Requirements:** CG generally does not impose a minimum size for establishing a relationship.

**Additional Information:** Part 2 of our Form ADV, which is available [here](#), provides more detailed information about CG's services.

**Conversation Starters.** 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 Standard of Conduct**

What fees will I pay?

Advisory fees are based on a percentage of assets under management along with the size and complexity of the account, the investment products used, the level of specialized service, and the historical relationship. Fees are negotiable but may be subject to a minimum annual fee of \$10,000, with the standard fee being 1%.

A third-party broker can charge transaction fees or asset-based fees in a separately managed portfolio. If mutual funds are used, clients could pay mutual fund fees in addition to the advisory fees paid to CG. A large portion of CG's assets under management are invested in Private Funds. The Private Funds are generally charged a fee by the manager (CG or its affiliate Corundum Partners, Inc., and in some cases, third-party investment managers), which is paid from fund assets. These management fees are in addition to the advisory fees paid by clients to CG. The amount of the management fee depends on the type of Private Fund and is disclosed in the offering documents which are available to investors and prospective investors. The fee is typically based on the net asset value as of the previous quarter-end and on capital contributions during the quarter.

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.

**Additional information** about CG's fees and costs is available in Part 2 of our Form ADV, which is available [here](#).

**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 provide you with a recommendation, we must 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 to you. Here are some examples to help you understand what this means. Because CG charges advisory fees based on a percentage of assets, CG has an incentive to encourage you to increase the assets in the account and an incentive to increase the valuations of the assets. Because CG also charges a management fee for its private funds, it has an incentive to recommend those private funds or invest clients' funds in them. CG has private funds that invest in apartments for which it receives a management fee from the third-party investment manager. CG could also receive a performance fee in connection with those investments. CG has an incentive to recommend those investments or invest client's funds in them. Allocations of investment opportunities in the private funds will not be uniform among clients. CG has transactions with affiliates that create conflicts of interest. In certain cases, loans are made between clients, family partnerships, and/or CG employees. CG uses RBC Wealth Management as a broker-dealer from whom CG receives research and other products and services.

**Conversation Starter.** Ask your financial professional—

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

**Additional information** about conflicts of interest between CG and its clients is available in Part 2 of our Form ADV, which is available [here](#).

*How do your financial professionals make money?*

CG's financial professionals receive incentive compensation based on certain fees earned by CG. This compensation is affected by the amount of client assets and which investments are selected, creating a conflict of interest because financial professionals have an incentive to encourage clients to add assets and to recommend investments that provide incentive compensation.

#### Item 4. Disciplinary History

**Do you or your financial professionals have legal or disciplinary history?** Yes  No

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

Updated copies of this form and additional information about CG can be found [here](#). If you have any questions about this brochure or if you would like to request a copy of this Relationship Summary, please contact Melissa Starr by calling (719)228-1080.

**Conversation Starter.** Ask your financial 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?*