

BRAINVEST WEALTH MANAGEMENT LLC  
FORM ADV PART 3  
CLIENT RELATIONSHIP SUMMARY  
March 2025

ITEM 1. INTRODUCTION

BRAINVEST WEALTH MANAGEMENT LLC is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. This document gives you a summary of the types of services and fees we offer. Please visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for free, simple tools to research firms and for educational materials about broker dealers, investment advisers, and investing.

ITEM 2. RELATIONSHIPS AND SERVICES

Questions to ask us: 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? What investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: portfolio management (we review your portfolio, investment strategy, and investments). As part of our standard services, we typically monitor client accounts on a monthly basis. Our firm offers both discretionary advisory services (where our firm makes the decision regarding the purchase or sale of investments) as well as nondiscretionary services (where the retail investor makes the ultimate decision). We do not limit the types of investments that we recommend. Our minimum account size is \$1,000,000. Please also see our Form ADV Part 2A (“Brochure”), specifically Items 4 & 7.

ITEM 3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

A. Fees and Compensation

- Questions to Ask Us:
  - 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?
  - How might your conflicts of interest affect me, and how will you address them?
  - What fees will I pay?

Our advisory fees vary depending on the services you receive and the amount of assets in your account. The more assets you have, the higher the advisory fee, which creates an incentive for us to increase your assets. For performance-based fee arrangements, we benefit from higher investment returns, which may encourage us to take on more risk due to the higher risk/reward attributes. Portfolio management fees are typically charged quarterly in arrears. You pay fees even if there are no transactions in your account, and the advisory fee does not generally vary based on the types of investments selected.

B. Conflicts of Interest

1. Collaboration with Iteram Capital SA:

Brainvest collaborates with Iteram Capital SA on the Philae Fidelio Fund. This partnership could present conflicts of interest due to compensation arrangements. These conflicts are managed by adhering to our fiduciary duties to act in the best interest of our clients.

2. Economic Interests in Stoneweg S.A.:

Certain Brainvest clients, its parent company, and partners hold an indirect economic interest in Stoneweg S.A., which manages funds in which Brainvest clients invest. This presents a potential conflict of interest, but Brainvest has policies in place to prioritize client interests and ensure transparency.

3. Portfolio Manager for Third-Party Funds:

A Brainvest advisor serves as a portfolio manager for third-party funds, which could lead to conflicts when recommending those funds to clients. Brainvest has policies in place to address these conflicts and ensure that recommendations are made based on what is in the best interest of clients.

### C. Standard of Conduct

As your investment adviser, Brainvest is bound by a fiduciary duty to act in your best interests at all times, which includes managing conflicts of interest and ensuring that our fees and compensation align with the services we provide.

Please also see Items 4, 5, 6, 7 & 8 of our Brochure.

**Third Party Costs:** Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. You will also pay fees to a custodian that will hold your assets.

Additionally, you will typically pay transaction fees when we buy and sell an investment for your account. 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. Please also see our Brochure for additional details.

**Conflicts of Interest:** 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. How do your financial professionals make money? Primarily, we and our financial professionals benefit from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Our financial professionals also have the ability to receive commissions from clients. Please also see Item 10 of our Brochure for additional details.

### ITEM 4. DISCIPLINARY HISTORY

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct? Do you or your financial professionals have legal or disciplinary history? We do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

### ITEM 5. ADDITIONAL INFORMATION

Questions to ask us: 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? For additional information on our advisory services, see our Brochure available at <https://adviserinfo.sec.gov/firm/summary/289743> and any individual brochure supplement your representative provides.

If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 305-224- 8834.