





Item 1 – Introduction: Is an investment advisory account right for you?

Odyssey Capital Advisors Inc. is registered with the Securities and Exchange Commission as an investment advisor. Please be aware that brokerage and investment advisory services and fees differ and that it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – What investment services and advice can you provide me?

We offer investment advisory services to retail investors. Our principal services include financial planning and consulting, asset management, and the selection or recommendation of other advisers. As part of our standard asset management services, we provide continuous and regular supervisory and/or management services with respect to your account(s). When deemed appropriate for the client, we may hire sub-advisors or recommend a third-party manager to manage all or a portion of the assets in the client's account. All accounts are managed in accordance with the client's investment needs. Our asset management services are offered on a discretionary basis. Discretionary authorization allows us to determine the specific securities, and the number of securities, to be purchased or sold for your account without your approval prior to each transaction, and to hire sub-advisors at our discretion. We do not limit our advice to proprietary products, or a limited menu of products or types of investments. Our financial plans cover various topics such as Wills, Estate Plans and Trusts, Investments, Qualified Plans, Insurance, Retirement Income, Social Security, and College Planning. In general, we require a minimum of \$250,000 to establish a relationship with us. At our discretion, we reserve the right to waive this minimum.

For additional information, please refer to Items 4 and 7 of our Form ADV Part 2A at the following link: https://adviserinfo.sec.gov/firm/brochure/299034

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 – What fees will I pay?

We are primarily compensated by a percentage of assets under our management, hourly fees, and fixed fees. Our fees are negotiable and vary depending on the services you receive. Asset management fees are based upon a percentage of your assets under our management and are typically payable quarterly in advance. The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account. Financial planning and consulting services are provided for an hourly or fixed fee. The exact fee and payment arrangement are set forth in the client agreement. When we use a sub-advisor, you will pay an additional fee; when you use a recommended third-party manager, we receive a portion of the fee you pay the third-party manager.

For additional information regarding our fees, please see Item 5 of our Form ADV Part 2A at the following link: https://adviserinfo.sec.gov/firm/brochure/299034

Description of Other Fees and Costs: The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by third parties and investment companies (i.e., mutual funds, exchange traded funds, unit investment trusts, and variable annuities). These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. You will also be responsible for sub-advisory, third-party manager, and/or platform fees, brokerage fees, custody fees, account administrative fees, fees and expenses related to mutual funds and exchange-traded funds, and applicable securities transaction fees. These charges and fees are typically imposed by the custodial broker-dealer that executes the trade. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our firm, and others. 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 fees charged by third parties, please refer to Item 5 of Form ADV Part 2A at the following link: https://adviserinfo.sec.gov/firm/brochure/299034

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?

<u>When we act as your investment adviser</u>, 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 is an example to help you understand what this means:

- All investment advisers face conflicts of interest that are inherent in the business. Our primary source of compensation is through
 asset-based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management. Other conflicts
 of interest result from compensation received from other business activities we engage in, such as insurance-related business, as
 well as conflicts arising from relationships we have with business partners, such as Schwab, our custodial broker-dealer, and other
 vendors.
- We may use a sub-advisor or recommend that you use a third-party manager for managing your account which will result in an additional fee. These compensation arrangements present conflicts of interest due to a financial incentive to use or recommend the services of such third parties. Any sub-advisor's fees will be disclosed to you in the advisory agreement for your acknowledgment before engaging us for such services. You are not required to use the services of any third-party manager we recommend.
- When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

Conversation Starter. Ask your financial professional—

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

Please refer to our Form ADV Part 2A for further information on our conflicts of interest and how we address them at the following link: https://adviserinfo.sec.gov/firm/brochure/299034

How do your financial professionals make money?

Our financial professionals receive salary-based compensation, a percentage of advisory billings, and/or bonuses based on the amount of client assets they bring to our firm. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account. Our firm is also a licensed insurance agency, and our financial professionals are also insurance agents. This creates a conflict of interest because our firm and licensed individuals associated with our firm will receive additional commission-based compensation in connection with the sale of insurance products. This practice presents a conflict of interest because we and our financial professionals who are insurance agents have an incentive to recommend insurance products to you to generate commissions rather than making recommendations based solely on your needs. You are not required to purchase insurance from our firm or financial professionals.

Item 4 – Do you or your financial professionals have legal or disciplinary history?

No, neither our firm nor our financial professionals have legal or disciplinary history to disclose.

For a free, simple search tool to research us and our financial professionals please visit Investor.gov/CRS.

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

For additional information about our advisory services, please refer to our Form ADV Part 2A brochure available at https://adviserinfo.sec.gov/firm/brochure/299034 and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information, and/or need a copy of this Client Relationship Summary, please call us at (484) 278-4497.

Conversation Starters. 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?