

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. This document provides a summary of the types of services we provide and how you will pay for them. Please feel free to reach out to us for additional information. Questions you might consider asking us are noted (→) throughout this Summary.

Introduction

Menlo Advisors is an SEC registered investment adviser that has provided investment management services to retail investors since 2002. We do not provide services as a broker-dealer. There are differences between investment advisers and broker-dealers, and it is important for you to understand them as you decide what kind of account is right for you. You can learn more about the differences between investment advisers and broker-dealers at these SEC websites: <https://www.investor.gov> and <https://www.investor.gov/crs>.

What Investment Services and Advice Can You Provide Me?

Investment Management Services: If you request investment management services, we will:

- Develop an investment approach for you that reflects your age, income, family circumstances, financial condition, retirement goals, investment goals, and your risk tolerance.
- Conduct periodic reviews of your goals and asset allocation in response to changes in the above factors.
- Provide ongoing monitoring of your investment accounts.
- Monitor market, economic, and geo-political trends.
- Review relevant financial industry research on a routine basis.
- Buy and sell securities for your accounts that are consistent with your financial goals and risk tolerance.
- We will do so on a “discretionary” basis that authorizes us to trade without your approval of each trade.

Financial Planning Services: Depending upon your needs, as part of our management services, we will evaluate your financial condition and help you set financial goals and plan for retirement. Analyses may include education funding, insurance needs, charitable giving, estate and tax planning and employer stock options.

Pooled Investment Fund. We serve as the general partner and serve as the investment manager to Skyline Partners, LP, a “fund of funds.”

Additional detail about our services is provided in our Form ADV Part 2A at Item 4.

- Given my financial situation, should I choose an investment advisory service and 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 your professional qualifications mean?

What Fees Will I Pay?

These are the principal types of fees you will pay to us in connection with our services:

- Asset-Based Fees: Investment management fees charged as a percentage of the value of the assets under our management. These are paid quarterly.
- Hourly Fees: Financial consulting fees on an hourly fee basis are paid at the time the services are provided.
- Performance Fees: Skyline Partners Fund investors are given the option of paying a higher management fee or paying a lower investment management fee plus a performance fee based upon their share of the Fund's net capital appreciation.

Our Firm does not require a minimum portfolio size however, at the Firm's discretion, we may impose a minimum annual management fee of \$10,000. Our fees are negotiable and may vary among clients.

Other fees & costs you will pay to others in relation to your investments include:

- Custodian fees. If charged, these are paid to your custodian directly, on an annual or a monthly basis.
- Maintenance fees. If charged, these are paid to your custodian directly.

- Transactional and product-level fees (e.g., commissions, foreign taxes etc.) If charged, these are paid to your executing broker-dealer directly, at the time of each transaction.
- Fees related to Funds. Mutual funds, exchange traded funds (ETFs), ADRs (American Depositary Receipts) and pooled investments such as hedge funds, may impose ongoing management fees, administrative fees and redemption or surrender fees. These are paid to the issuer of the fund or ETF directly, typically monthly.

The fee any investment adviser charges reduces the value of your account when it is deducted each billing period. Please make sure you understand what fees and costs you are paying. You will pay the asset-based fee each period even if no securities are bought or sold in your account. You will pay fees and costs whether you make or lose money on your investments. More detail about our fees is in our Form ADV Part 2A, Item 5.

➔ **Help me understand how 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 remain in investment positions?**

What Are Your Legal Obligations to Me When Acting as My Investment Adviser?

We have adopted an internal Code of Ethics. When we act as your investment adviser, we must act in your best interest and not put our interests ahead of yours. Where the interests of our Firm or staff conflict with our duties to you, we must work to eliminate the conflict or inform you of it in clear terms. You should understand these conflicts because they can affect the investment advice we provide you.

How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

Here are examples to help you understand what this means:

- We charge fees for our services and that creates a conflict with your interests. The more assets there are in your investment account, the more you pay to us in fees. We therefore have an incentive to encourage you to increase the assets in your account. If we believe it is in your best interest, we will recommend you invest in securities rather than assets not managed by us and that you rollover a 401K retirement account to an IRA account managed by us.
- We advise you to custody your investment accounts with Charles Schwab because it provides us with essential trading, reporting, compliance, education and back-office services and investment research.
- Our employees may invest in the same, or different securities based upon their personal financial situations. All employee investments must be cleared by the Chief Compliance Officer to confirm there is no conflict with any client investment. Employee investments may perform as well as, better or worse than client investments.
- We have an incentive to advise you to invest in certain investments, such as Skyline Partners, LP, because we are the sponsor and manager of the Fund.

How Do Your Financial Professionals Make Money?

Our financial professionals are paid a salary based upon their education, professional training, work background and the level of skill, sophistication and dedication they exhibit in conducting their work for the Firm. Financial professionals who are owners of the business share in the profits of the business. Non-owner financial professionals receive salaries and are entitled to participate in the Firm's bonus program in years in which bonuses are awarded.

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

Do You or Your Financial Professionals Have Legal or Disciplinary Histories?

No. We recommend that you visit <https://www.investor.gov> and <https://www.investor.gov/crs> for a free and simple search tool to research our Firm and our financial professionals.

- ➔ **As a financial professional, do you have any disciplinary history? For which type of conduct?**
- ➔ **Who is my primary contact person?**
- ➔ **Is she or he an Investment Adviser Representative or a Broker-Dealer Representative?**
- ➔ **Who can I speak with if I have concerns about how this person is treating me?**

We encourage you to seek out additional information.

Visit <https://www.investor.gov/> that provides helpful educational materials to learn more about investing. For additional information on our advisory services, fees, conflicts and personnel, see our Form ADV Parts 1 and 2 on <https://www.adviserinfo.sec.gov/>. If you have any concerns or questions, or to obtain copies of our Form ADV Part 2 or Form CRS, contact Kent Seymour, at 650-688-0300.