



Form ADV Part 3: Relationship Summary Alhambra Investment Management, LLC

Introduction

Alhambra Investment Management, LLC (“AIM” or “we”) is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professional at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

What Investment Services and Advice Can You Provide Me?

Description of Services: AIM offers investment advisory services to retail investors. Our investment advisory services include: Asset Management Services with Financial Planning Services.

Asset Management Services: We provide asset management services which involves us managing and trading your designated account(s). We will discuss your investment goals and design a strategy to try and achieve your investment goals. We will continuously monitor your account when providing asset management services and contact you at least quarterly to discuss your portfolio. When engaging us for asset management services, you can choose whether you’d like us to provide services on a **discretionary** basis (we will have the authority to determine the type and amount of securities to be bought or sold in your account) or a **non-discretionary basis** (we will have to confirm any trades in your account with you before we place them). **Financial Planning Services:** We provide financial planning services as part of our asset management services. Financial planning services involve us creating a written financial plan for you which covers mutually agreed upon topics. For more information about our services, see **Item 4** and **16** of **Form ADV Part 2A**.

Limited Investment Offerings: We recommend investment portfolios designed to be suitable for each client relative to that client’s specific circumstances and needs. However, our investment advice will cover a limited selection of investments. Other firms could provide advice on a wider range of investments, which may have lower costs. When providing you services, we do not recommend or offer advice on any proprietary products. **Account & Fee Minimums:** A minimum of \$250,000 in assets under management is required to establish a relationship with AIM. This may be waived under certain conditions.

Conversation Starters: *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 Fees Will I Pay?

Description of Principal Fees & Costs: Asset Management Services are charged based on a percentage of assets under management, billed in advance on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the previous billing period. The annual fee is based upon a fee schedule ranging between 0.75% and 1.25%, with a negotiated fee for assets over \$5 million. We have an incentive to recommend that you increase the level of assets in your account. You will also incur other fees and expenses. The broker-dealer/custodian on your account may charge you transaction fees and/or custody fees. You will also be charged internal fees and expenses by any funds we invest in within your account. Any fees we charge for financial planning services will not cover the costs associated with implementing any recommendations we may make. **Additional Information:** 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 more information, see **Item 5 of Form ADV Part 2A**.

Conversation Starters: *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?**

Standard of Conduct: 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.

1) To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account ("IRA") managed by us and subject to our asset-based investment advisory fees, this is a conflict of interest because we have a financial incentive to recommend that you move your IRA to us even if it is not in your best interest. 2) When we provide asset management services, we ask that you establish an account with Fidelity Brokerage Services LLC, National Financial Services LLC, or Charles Schwab & Co., Inc. to maintain custody of your assets and to effect trades for your account. This recommendation is not based solely on your interest of receiving the best execution possible. They provide us with research, products and tools that help us manage your accounts. We do not have to pay for such benefits, which saves us money; however, these arrangements create a conflict of interest. 3) We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts.

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

Additional Information: For more information about our conflicts of interests and the ways we are compensated, please see **Item 5, 10, 11 and 12 of Form ADV Part 2A**.

How Do Your Financial Professionals Make Money?

Description of Salary/Payment of IARs: We compensate our investment adviser representatives based on the level of assets that the representative brings in to us. This creates a conflict of interest as it gives your representative an incentive to recommend you invest more in your account with us due to the potential for increased payments.

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

No. Neither us, nor our investment adviser representatives have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

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

Additional Information About AIM

Additional information about us and copies of our Form ADV Part 2A disclosure brochure and this relationship summary are available on the Internet at www.alhambrainvestments.com. You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/138537>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at 888-777-0970.

Conversation Starters: *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?*