



June 2, 2025

## 1. INTRODUCTION

Willow Grove Advisors, LLC. ("WGA"), is registered with the Securities and Exchange Commission (SEC) as an investment adviser.

Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Free and simple tools are available to you so you can research firms and financial professionals at: <https://www.investor.gov/CRS>. This website also provides educational materials about broker-dealers, investment advisers, and investing.

## 2. RELATIONSHIP AND SERVICES

### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

The principal services our firm offers include investment management and financial planning services to retail investors. Investment management services are provided on a discretionary basis, which means that we can make changes to your portfolio without first obtaining your express prior permission. We regularly monitor your investment accounts, and make investment changes when necessary. Our firm accepts new clients with a minimum of \$500,000 of investable assets. We do not offer any proprietary products, but our management service constitutes a wrap fee program as our clients do not pay any transaction costs.

When we manage your assets, we act as a fiduciary, which means that we must prudently take care of your money and must, at all times, act for your benefit.

We will provide a detailed financial plan for clients who request such a plan. You can find a more detailed description of our services in our Form ADV Part 2A and Wrap Brochure: [Brochures](#)

### ***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?*

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

### WHAT FEES WILL I PAY?

Our Investment Management fees are based on a percentage of Assets under Management. Asset Management fees are paid monthly and debited to your account. These fees generally range from 0.07% - 1.10% annually. Because we manage your assets within a wrap fee program, you will not typically pay additional transaction fees and thus our advisory fee may be higher than if you paid transaction fees separately. In addition to the fees we charge, you may also pay fees charged by individual Mutual Funds, Exchange Traded Funds, Separate Account

Managers or Limited Partnership Funds. Fees for Financial Plans are fixed and negotiated with each individual client.

Certain financial advisors also hold insurance licenses, but have no relationship with other third party unaffiliated financial services firms and will not receive compensation from recommending insurance products to you. You are not required to purchase such products or services from or through them. It is your choice.

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. You can find more detailed information about fees in our ADV Part 2A and Wrap Brochure:

[Brochures](#)

***CONVERSATION STARTERS, 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 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 a conflict with your interests. You should understand and ask us about these conflicts because they affect the recommendations we provide you. Here is an example to help you understand what this means: WGA and its investment adviser representatives receive compensation based on a percentage of your assets under management. As the value of your assets under management increase, total compensation you pay to WGA and its representatives also increases. However, if your account value decreases, you will still pay a fee to WGA and its representatives, though that fee will also decrease.

***CONVERSATION STARTER, ask your financial professional:***

*HOW MIGHT YOUR CONFLICTS OF INTEREST AFFECT ME, AND HOW WILL YOU ADDRESS THEM?*

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

All our financial professionals receive a salary. They do not receive any incentive compensation for recommending specific products or bringing in new clients. Because we manage your portfolio in a wrap fee program, we have an incentive to limit trading in your account and to favor asset types that do not have a transaction fee in order to minimize trading expenses that we would have to normally pay out of our management fee.

#### **4. DISCIPLINARY HISTORY**

No, neither our firm, nor any of our Advisory Affiliates have a disciplinary history. You can research our firm at: <https://www.investor.gov/CRS>.

#### **5. ADDITIONAL INFORMATION**

You can obtain additional information by calling: (510) 705-1693 or on our website at: <https://willowgroveadvisors.com/>

***CONVERSATION STARTER, ask your financial professional:***

*WHO IS MY PRIMARY CONTACT PERSON? IS HE OR SHE A REPRESENTATIVE OF AN INVESTMENT ADVISER OR A BROKERDEALER? WHO CAN I TALK TO IF I HAVE CONCERNS ABOUT HOW THIS PERSON IS TREATING ME?*

**Material Changes:**

We have updated Items 2 and 3 of this CRS to disclose our Wrap Fee Program, fees associated with our services, and potential conflicts of interest.