

**Item 1: Introduction**

Granite Group Advisors, LLC ("Granite Group", "we" or "us") is registered with the SEC as an investment adviser. SEC Registration does not imply a certain level of skill or training. You should be aware that services and fees differ between investment advisers and broker dealers and it is important for the *retail investor* to understand the differences.

*Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.*

**Item 2. Relationships and Services****What investment services and advice can you provide me?**

- (i) **Description of Services:** We offer investment advisory services to assist clients in asset allocation among various asset classes, including equities, fixed income, real estate, hedge funds, and private equity. We recommend independent investment managers as sub-advisers if appropriate, and private investment funds. Our structure utilizes independent custodians and managers. As part of the services we offer to retail investors, we monitor client accounts on a quarterly basis at a minimum. In addition, we monitor markets, funds, and holdings in our client accounts daily. Private placements are monitored based on the availability of updates, and asset classes are monitored weekly or more frequently.
- (ii) **Investment Authority:** Granite Group accepts discretionary authority, meaning that we are authorized to trade securities in your account without asking for specific permission. We are also authorized to hire (and fire) sub-advisers on your behalf pursuant to the terms of your investment management agreement with us. We notify our clients of meaningful changes in their investment accounts. We will accept non-discretionary accounts or positions at a client request.
- (iii) **Limited Investment Offerings:** Our advice is not limited with respect to products or types of investments.
- (iv) **Account minimums:** Our general account minimum for retail investors is \$5,000,000, which may be waived.

**Additional Information:** Additional information about our services and relationships can be found in Item 4 of our ADV Part 2A, which is available on our website [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com) and on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**Conversation Starters -- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean? How will you choose investments to recommend to me?**

**Given my financial situation, should I choose an investment advisory service? Why or why not? What fees will I pay?**

A discretionary investment advisory service will manage your portfolio without your input. Advisers have experience with a variety of financial situations and can advise you on a continuous basis. If you want to research, monitor, and trade your own investments, you can use a broker-dealer. Our ADV 2B is available on our website [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com).

**Item 3: Fees, Costs, Conflicts, and Standard of Conduct**

Our Fees generally range from .30% to .75% of assets under management, charged quarterly in advance. Accounts with higher balances will pay a lower overall fee rate with breakpoints at \$10, \$20, \$50, and \$100 million. Additional or higher fees of up to 1.25% may be charged for unique services or highly customized investment advice. For comprehensive quarterly reporting, including accounts not managed by us, we charge an additional three basis points (.03%) of assets under management. We charge performance fees of 5% of net profits, with respect to specific private investments as per the applicable client agreements. Fees are negotiable in certain situations. Our fees do not include trading fees or brokerage commissions, transaction fees, exchange fees, SEC fees or custody fees, wire transfer, electronic fund fees and other related costs and expenses charged by custodians, brokers and/or other third-parties. 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.

**Outside investment management fees**

You will also bear the fees of sub-advisers if we hire them. Annual fees for traditional equity managers vary, but typically range from between 0.40% to 0.95%. Annual fees for traditional fixed income managers vary, but typically range from 0.15% to 0.25%. Fees of non-traditional investment managers (e.g., hedge fund and other private fund managers) typically consist of an asset-based management fee ranging from 0.5%-2.5% per year of assets under management, and a

For up to date information or to request a current copy of Form CRS or ADV, contact Patrice Holland at [pholland@granitegroupadvisors.com](mailto:pholland@granitegroupadvisors.com) or 203-210-7814 or visit our website at [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com).

performance-based fee or allocation ranging from 10%-25% of net profits achieved during a particular year. You will also pay fees assessed by mutual funds, exchange traded funds and private investment funds (which typically include investment management fees and/or other operational expenses). These fees would be disclosed in the applicable mutual fund, ETF, or private fund prospectus.

We do not receive any outside compensation for referrals or sub-advisory relationships, or in connection with the purchase and/or sale of securities or funds on behalf of clients. We do not receive any soft dollar credits from broker-dealers. **Detailed information about the fees we charge is disclosed in Item 5 of our ADV Part 2A, available on our website [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com) and on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

**Examples of Ways You Make Money and Conflicts of Interest:** summarize at least one material conflict of interest that affects retail investors.

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

When we act as your investment adviser, we must 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 about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.

Although we believe that higher dollar amount of fees for more assets aligns our interests with yours, knowing that our fees will be higher may create an incentive for us to encourage you to increase the assets in your account. Our policies require that no client account be favored over another and policies are monitored by our Chief Compliance Officer. One of our principals acts as trustee to certain client accounts, but we do not believe that creates any conflict as those clients do not pay any additional fees and our policies prohibit favoring any accounts. For more information on Conflicts of Interest, see Items 6, 10, 11 and 12 of our ADV Part 2 Brochure on our website [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com).

#### **How do your financial professionals make money?**

Our financial professionals are paid directly from the fees charged to the client accounts. We receive no direct compensation from securities or mutual funds that we buy or sell on behalf of our clients. Increased assets under management will lead to increased fee revenues for the firm and potentially, increased compensation for our financial professionals.

#### **Item 4. Disciplinary History**

**Do you or your financial professionals have legal or disciplinary history? For what type of conduct?**

No. Further information is available at [Finra.org](http://Finra.org) or [Investor.gov/CRS](http://Investor.gov/CRS). **Our Form ADV Part 2B is available on our website [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com) and includes our CVs.**

#### **Item 5. Additional Information**

Please look for further information at [granitegroupadvisors.com](http://granitegroupadvisors.com), or call us at 203-210-7814 if you have any questions. **You can find our Brochure on our website at [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com) or request a copy by calling the number above or emailing [pholland@granitegroupadvisors.com](mailto:pholland@granitegroupadvisors.com).**

**Who is my primary contact person? Is he or she a representative of the investment adviser? Who can I talk to if I have concerns about how this person is treating me?** Investment questions: Richard Zipkis or Lyle Himebaugh. Operational questions Patrice Holland or David Gersten. 401(k) questions: Sharlene Kelly. If you ever have an issue with one member of the firm, please feel free to call any other member to discuss your concerns.

For up to date information or to request a current copy of Form CRS or ADV, contact Patrice Holland at [pholland@granitegroupadvisors.com](mailto:pholland@granitegroupadvisors.com) or 203-210-7814 or visit our website at [www.granitegroupadvisors.com](http://www.granitegroupadvisors.com).