



**Two Prime LLC
Form CRS Customer Relationship Summary
December 2021**

Introduction

Two Prime LLC (“Two Prime” or the “Firm”) is registered with the Securities and Exchange Commission as an Investment Adviser. The Firm is a Limited Liability Company, with offices in Denver, CO and organized under the laws of Delaware. Two Prime began operations in 2019. Its principal owners are Marc Fleury, Alexander Blum and Nathaniel Cox.

Brokerage and investment advisory services and fees differ, and 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.

What investment services and advice can you provide me?

Two Prime provides portfolio management services tailored to the unique needs and investment goals of our clients. We manage portfolios on a **discretionary** basis, as determined by our clients’ goals and preferences. All portfolios are individually managed and monitored on an ongoing basis to meet the risk and return objectives of each Client. Two Prime requires a minimum account size of \$10 million to enter into a Client relationship for portfolio management services.

For additional information regarding Two Prime’s investment services, please see the Firm’s ADV Part 2A (Firm Brochure), which is available [here](#).

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?**

What fees will I pay?

Client fees are negotiable, and individual arrangements are based on Client specific factors, including, but not limited to, assets under management and the risk/return parameters of the investment. Two Prime charges an **Asset-based fee, depending on the nature of services provided**. The typical Asset-based fees are 1.5% per annum of managed assets, payable quarterly in arrears. The more assets in a Client account, the more fees that will be assessed and paid. This may create a conflict of interest as Two Prime may have an incentive to encourage Clients to increase the assets in their account.

Two Prime manages investments through separate Client accounts and private funds. In addition to the fees stated above, there are additional fees born by Clients, such as fees charged by investment vehicles used in the management of Client accounts, including but not limited to pooled investment vehicles, custodian costs, transaction expenses (including brokerage fees), and legal expenses. Clients may be charged additional fees by their service providers, such as a wire transfer fee from a bank. Two Prime charges no termination fee.

Two Prime’s fees are paid in accordance with the terms of the Client’s signed agreement with Two Prime. In most cases, for its asset management Clients, Two Prime receives its fees directly from the Client’s custodian.

Please note that 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 regarding Two Prime’s fees, please see the Firm’s ADV Part 2A (Firm Brochure), which is available [here](#).



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?

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 that means.

Two Prime undertakes to act in a fair and equitable manner and to resolve and mitigate conflicts or potential conflicts in a timely manner. Because Two Prime has the responsibility for managing more than one account, sometimes with different fee structures, (e.g., side-by-side management), potential conflicts of interest can arise, including but not limited to the potential for providing preferential treatment to one account over others in terms of allocation of management time, resources, and investment opportunities.

To mitigate this risk, Two Prime determines target holdings and weightings for each investment strategy. Two Prime has policies and procedures in place so that investment strategies are systematically applied at an account level to minimize any potential for bias. Two Prime has also put in place policies and procedures that seek to ensure fair allocation of investment opportunities among all Clients.

Conversation Starter. Ask your financial professional—

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

For additional information regarding Two Prime’s potential conflicts of interest, please see the Firm’s ADV Part 2A (Firm Brochure), which is available [here](#).

How do your financial professionals make money?

The Firm earns all of its revenue from advising and managing Client portfolios. All Two Prime employees are paid a base salary and are eligible for an annual discretionary bonus.

Do you or your financial professionals have legal or disciplinary history?

No. None of Two Prime’s employees have any legal or disciplinary histories. You can access <https://www.investor.gov/CRS> for a free and simple search tool to research Two Prime’s financial professionals.

Conversation Starter. Ask your financial professional—

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

Additional Information

For additional information about our services, you may contact Nathan Cox at nathan.cox@twoprime.fund, or (480)-290-4951. If you would like additional, up-to-date information or a copy of this disclosure, please call Nathan Cox at (480)-290-4951. If you have a concern about any Two Prime employee, you may contact the SEC’s Office of Investor Education and Advocacy (“OIEA”) at 1-800-732-0330, or <https://www.investor.gov/CRS>.

Conversation Starter. 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?**