

Form ADV Part 3 – Client Relationship Summary - EarlyBird

Date: June 1, 2021

Item 1 - Introduction

EARLYBIRD CENTRAL INC. (“EarlyBird,” “we,” or “our”) is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services to retail investors. This document gives you a summary of the types of services and fees we offer. 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. Please visit www.investor.gov/CRS for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

What Investment Services and Advice Can You Provide Me?

Our firm primarily offers the following investment advisory services to retail clients: discretionary portfolio management via a wrap fee program (we review your portfolio, investment strategy and investments). As part of our standard services, we typically monitor client accounts on a weekly basis. We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. Our firm imposes a \$200 account minimum. Please also see our Form ADV Part 2A Appendix 1 (Wrap Fee Brochure), specifically Items 4 & 5.

- 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?

Wrap Fee: We charge a wrap fee to each custodial account for the investment advisory services provided by ECI and for the transaction fees charged by Apex Clearing Corporation (“Apex”) as the broker. Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that we have an incentive to limit trading activities for those accounts since our firm absorbs those transaction costs. All wrap fees are paid monthly. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see our Wrap Fee Brochure, Item 4.

Other Fees: certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or ETF, fees associated with “step out” transactions if the account uses broker-dealers other than Apex, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. From time to time, in their sole discretion, EarlyBird, the broker, and/or the custodian may adjust the amounts or types of fees they charge for ancillary services. **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.** Please also see our Wrap Fee Brochure for additional details.

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→ 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 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.

- As described in the “What fees will I pay?” section above, our fee structure gives us an incentive to encourage you to open more accounts with us and use more of our services.
- Additionally, when placing orders for various customers across portfolios, it may be necessary from time to time to aggregate orders, such as to achieve round lots, in such cases, some of the orders aggregated may include accounts in which we, our employees and/or principals have an economic interest, and it is possible that some orders receive better execution than others.

How Do Your Financial Professionals Make Money?

Primarily, we and our financial professionals benefit from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see our Wrap Fee Brochure, Item 9 for additional details.

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

Do You or Your Financial Professionals Have Legal or Disciplinary History? We do not have legal and disciplinary events. Visit *Investor.gov/CRS* for a free, simple search tool to research us and our financial professionals.

→ As a financial professional, do you have any disciplinary history? For which type of conduct?

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, **see our Form ADV Part 1 and Part 2 available at <https://adviserinfo.sec.gov/firm/summary/307201> and any individual brochure supplement** your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 347-469-8150.

→ Who is my primary contact person?

→ Is she or he an Investment Adviser Representative or a Broker-Dealer Representative?

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→ Who can I speak with if I have concerns about how this person is treating me?

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Exhibit A – Material Changes to Client Relationship Summary

We have made the following material changes since the prior Client Relationship Summary:

We updated our services to indicate we provide discretionary portfolio management services and removed a reference to non-discretionary services.

We updated our services to indicate we impose a \$200 account minimum.

We updated references to our ADV Part 2A, Appendix 1, Wrap Fee Brochure rather than ADV Part 2A brochure.