

Part 2A of Form ADV: Firm Brochure

Item 1 – Cover Page

Creative Resources Investment Advisors, LLC

85 Tollgate Road

Warwick RI, 02886

401-738-0070

March 18, 2019

This Brochure provides information about the qualifications and business practices of Creative Resources Investment Advisors, LLC ("CRIA"). If you have any questions about the contents of this Brochure, please contact us at (401) 738-0070. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

CRIA is a registered investment adviser. Registration of an Investment Adviser does not imply any certain level of skill or training. The purpose of this form is to provide you with information you may use to determine to hire or retain an adviser.

Additional information about CRIA also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for CRIA is 110484. The SEC's web site also provides information about any persons affiliated with CRIA who are registered, or are required to be registered, as investment adviser representatives of CRIA.

Item 2 – Material Changes

This Item of the Brochure will discuss only specific material changes that are made to the Brochure and will provide clients with a summary of such material changes. The last update to the Brochure was March 29, 2018.

There are currently no material changes to Creative Resources Investment Advisors, LLC since the last update.

As in the past, we offer or deliver information about our qualifications and business practices to clients on at least an annual basis. Pursuant to the SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year.

We may further provide other ongoing disclosure information about material changes as necessary, and we will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Armand Spaziano, President and Chief Compliance Officer, at 401-738-0070.

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Item 4 – Advisory Business

Creative Resources Investment Advisors, LLC has been providing investment advisory services since 1994. We provide these services primarily to individual and high-income individual clients, as well as to some pension and profit-sharing plans.

As of January 31, 2019, CRIA managed approximately \$15,765,125 on a discretionary basis, and \$10,735,198 on a non-discretionary basis.

Principal Owners

Armand C. Spaziano is the President and owner of Creative Resources Investment Advisors, LLC.

Services Portfolio

Management Services

CRIA provides discretionary or non-discretionary portfolio management services where the investment advice provided is custom tailored to meet the needs and investment objectives of the client. Once the portfolio is constructed, CRIA provides continuous supervision and re-optimization of the portfolio as changes in market conditions and client circumstances may require. CRIA does not regularly recommend to CRIA clients private fund investment as part of CRIA's core portfolio management services. However, if suitable to a sophisticated CRIA client, CRIA may recommend investment in a private fund, including to a private fund affiliated with a CRIA-related person.

Additionally, when CRIA thinks it is appropriate for the client's goals and financial situation, CRIA may from time-to-time recommend a client establish a secondary managed account with a qualified third-party manager for fixed income, domestic equity, and foreign equity investments. In this instance, any additional fees incurred will be fully disclosed to the client who will sign a separate management account agreement with this third-party account manager. The third-party manager will determine and administrate their fees with the client directly, and CRIA will clearly disclose all fees the client will pay to CRIA for the management of this account, as well.

Pension Consulting Services

CRIA will provide pension-consulting services to employee benefit plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include an existing plan review, formation of the investment policy statement, asset allocation advice, money management services, investment performance monitoring, ongoing consulting, and/or communication and education services where CRIA will assist the plan sponsor in providing

meaningful information regarding the retirement plan to its participants.

Advisory services for individually-managed accounts

Our focus is on value investing and our horizon is long-term. We conduct our research via a variety of sources and methods. These include:

- Financial newspapers and magazines
- Research materials prepared by others
- Corporate rating services
- Inspections of corporate activities
- Annual reports, prospectuses, and filings with the Securities and Exchange Commission
- Company press releases

For our investment management, we primarily use various types of equity securities, corporate, government, and municipal bonds, mutual funds, and certificates of deposit. When we feel it is appropriate, we also utilize warrants, variable annuities, futures contracts, securities options, and partnerships, such as those related to real estate, energy interests, and leasing.

We tailor client portfolios to the client's individual needs. We then meet with and speak to the client regularly to determine whether there has been any significant change in the client's circumstances and financial needs. This way, we can continue to monitor whether the client's account continues to conform to the client's investment objectives and requirements. We generally attempt to accommodate any investment restrictions that have been made known to us by clients (for example: an aversion to tobacco or casino companies).

Item 5 – Fees and Compensation

Portfolio Management Services

The annual fee for portfolio management services is billed quarterly in arrears, is due on the fifteenth day of the calendar quarter, and is based on the account's asset market value on the last business day of the prior calendar quarter. Fees are prorated for accounts opened during the quarter. Fees for portfolio management services are negotiable and generally range from 0.5% to 1.9% per year of the assets under management. Fees are not allowed to exceed 1.9% annually, and fees are typically based on the amount of assets under management and the range of services being provided. The fee amount may also vary depending on the specific investment adviser representative managing the account, and the fee schedule in place at the time of initial client engagement.

CRIA will invoice the client directly or payment will be made by the qualified custodian holding the client's funds and securities, provided the client supplies written authorization permitting the fees to be paid directly from the account. CRIA will not have access to client funds for payment of fees without written consent by the client. Further, the qualified custodian agrees to deliver a quarterly account statement directly to the client, which shows all disbursements from the account. The client is encouraged to review all account statements for accuracy. CRIA will receive a duplicate copy of the statement that was delivered to the client. Since fees are payable after services are provided, there are no unearned fees and the client is not due a refund upon early termination of an investment advisory contract. However, CRIA's fees are prorated to the date of termination.

The fee is based on a percentage of assets under management in accordance with the following tiered schedule:

Assets Under Management **	Annualized Fee*
First \$1,000,000	1.00%
Next \$4,000,000	0.50%
Over \$5,000,000	negotiable

*In certain circumstances fees may be negotiated.

** At CRIAs' discretion, CRIA may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee. CRIA may allow such aggregation, for example, where CRIA services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and other types of related accounts. This consolidation practice is designed to allow client(s) the benefit of an increased asset total, which could potentially cause the account(s) to be assessed a reduced advisory fee based on the breakpoints available in CRIA's fee schedule as stated above.

Pension Consulting Services

CRIA primarily provides Pension Consulting Services as an incidental benefit to their clients.

All Pension Consulting accounts are regulated under the Employee Retirement Income Securities Act ("ERISA"). CRIA will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision as to retaining the services of such investment advisers as CRIA recommends. The plan fiduciary is

free to seek independent advice about the appropriateness of any recommended services for the plan.

GENERAL INFORMATION ON ADVISORY SERVICES AND FEES

The fee charged is calculated on a case-by-case basis with each client and is not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds or any portion of the funds of an advisory client (SEC Rule 205(a)(1)).

Accounts initiated or terminated during a calendar quarter will be charged on a prorated basis and, upon termination earned, unpaid fees, if any, will then be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. Also, per the CRIA client agreement, CRIA clients may terminate an advisory agreement at any time.

Advice offered by CRIA may involve investment in mutual funds. All fees paid to CRIA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, brokerage commissions, transaction charges, and other related costs and expenses are involved with the purchasing or selling of securities and are incurred by clients.

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, 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. CRIA does not share in any portion of the brokerage fees or transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by mutual funds, CRIA, and others to understand the total amount of fees to be paid by the client.

Please see **Item 12** and **Item 14** which further describe the factors that CRIA considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation. Please see **Item 10** for a description of other compensation that may be provided to supervised persons for the sale of other products or services.

Item 6 – Performance-Based Fees and Side-By-Side Management

CRIA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), side-by-side with its standard asset-based

compensation. All fees are calculated as described above and are not charged on the basis of income or capital gains, or capital appreciation of the funds or any portion of the funds of an advisory client.

Item 7 – Types of Clients

CRIA offers personalized investment advisory services to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and/or other business entities.

CRIA generally imposes a minimum of \$100,000 to open and maintain an advisory account. However, this account minimum may be waived at the discretion of CRIA if, for example, the client appears to have significant potential for increasing assets under management. CRIA generally will allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account requirement.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

CRIA's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. CRIA's investment approach is firmly rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. CRIA recommends diversified portfolios, principally through the use of a blended (strategic/tactical) management style. CRIA selects or recommends to clients' portfolios of individual securities, broadly-traded open-end mutual funds or conservative fixed income securities to implement this investment strategy.

Although all investments involve risk, CRIA seeks to mitigate risk through broad diversification among asset classes. CRIA utilizes a broad range of investment vehicles to diversify client portfolios. CRIA designs portfolio strategies tailored to the needs of each investor. However, frequent trading of securities increases brokerage and other transaction costs that CRIA's strategy seeks to minimize.

In the implementation of investment plans, CRIA therefore uses individual securities, mutual funds, ETFs and, as appropriate, portfolios of conservative fixed income securities. From time to time, CRIA may provide consultation to sophisticated, risk-tolerant investors, for whom we may utilize leveraged investments (ETFs), more frequent trading, and incorporate third party information.

Clients may hold or retain other types of assets as well, and CRIA may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services, but may help to more generally assist the client.

CRIA's strategies do not utilize securities that we believe would be classified as having any unusual risks and we do not recommend frequent trading, which can increase brokerage other costs, such as increased tax burdens. CRIA does not utilize a private fund strategy as part of its core portfolio management services.

While CRIA does not, therefore, regularly recommend that CRIA clients invest in SpaGus Ventures Fund, LLC or any other fund, CRIA may recommend a fund, including the SpaGus Ventures Fund, LLC affiliated with Mr. Armand Spaziano, where CRIA determines such investment is suitable to a CRIA sophisticated client. Any such fund investment decision remains at the full discretion of the CRIA client. CRIA will discuss the strategy of these particular fund investments and their risks with each suitable client prior to investment. Clients should refer to the private placement memorandum for each fund to further understand the fund's risks. Risks associated with a particular drug, diagnostic, or device development under consideration for investment in SpaGus Ventures Fund, LLC will be disclosed in the private placement memorandum.

Analysis of a Client's Financial Situation

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, CRIA relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. To derive a recommended asset allocation, CRIA may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those used in the analysis.
- The risk that future rates of return will fall short of the estimates used in the simulation.
- The risk that inflation will exceed the estimates used in the simulation.
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis.

We base our investment recommendations on the client's financial situation at the time and on

financial information disclosed to us by the client. When preparing these recommendations, we make certain assumptions regarding interest and inflation rates, as well as regarding past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. We cannot offer any guarantees or promises that the client's financial goals and objectives will be met. Further, the client must continue to review any recommendations, and update the investment plan based upon changes in the client's financial situation, goals or objectives or changes in the economy. Should the client's financial situation, goals, objectives or needs change, the client must notify CRIA promptly of the changes.

Risk of Loss

Investing in securities involves a risk of loss that clients should be prepared to bear.

All investments present the risk of loss of principal—the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by CRIA may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in CRIA's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Non-U.S. securities, non-U.S. currencies, and securities issued by U.S. entities with substantial non-U.S. operations can involve additional risks relating to political, economic, or regulatory conditions in non-U.S. countries. These risks include fluctuations in non-U.S. currencies; withholding or other taxes; trading, settlement, custodial, and other operational risks; and the less stringent investor protection and disclosure standards of some non-U.S. markets. All of

these factors can make non-U.S. investments, especially those in emerging markets, more volatile and potentially less liquid than U.S. investments. In addition, non-U.S. markets can perform differently from the U.S. market.

The risks of non-U.S. investments typically are greater in less-developed countries, sometimes referred to as emerging markets. For example, political and economic structures in these countries may be less established and may change rapidly. These countries also are more likely to experience high levels of inflation, deflation, or currency devaluation, which can harm their economies and securities markets and increase volatility. Restrictions on currency trading that may be imposed by emerging market countries will have an adverse effect on the value of the securities of companies that trade or operate in such countries. Additionally, in some emerging market countries expropriation of private property is a risk.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CRIA or the integrity of CRIA's management. Please see the **Part 2B of Form ADV: Brochure Supplement(s)** for additional information.

Item 10 – Other Financial Industry Activities and Affiliations

Roman Capital Partners, LLC. Armand C. Spaziano is President and sole owner of Roman Capital Partners, LLC, which offers alternative investment evaluations, and consultation services. This entity is also a conduit for fixed indexed annuity product commissions earned by Mr. Armand C. Spaziano.

CRIA clients are not obligated to utilize the products or services of Roman Capital Partners, LLC.

Legend Advance Funding was formed in November 2014. Mr. Augustyniak and Mr. Szczesinski provide consulting on merchant funding for this company.

Augustyniak Insurance Agency, Inc. was formed in April 2017 by Mr. Augustyniak as an agency through which he may offer Farmer's Insurance Group products such as life, long-term care, health, home, and auto insurance.

Messrs. Armand C. Spaziano, Theodore R. Augustyniak, and Bradford D. Szczecinski, in their separate capacities as insurance agents or brokers, will be able to effect securities transactions and/or purchase investment products, such as insurance, for portfolio management clients, for which they will receive separate, yet customary compensation. However, clients are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. While these individuals endeavor at all times to put the interests of the clients first as part of CRIA's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the objectivity of these individuals when making recommendations. CRIA notes that there may be other suitable securities and investment products available through other broker-dealers.

SpaGus Capital Partners, LLC. Armand Spaziano is the sole owner and principal in the management company, SpaGus Capital Partners, LLC. SpaGus Capital Partners LLC offers and manages the fund **SpaGus Ventures Fund, LLC**, a private investment fund open only to accredited investors providing both debt and equity capital for small, privately-held firms. SpaGus Ventures Fund, LLC is closed to new investors.

Although some CRIA clients are invested in the SpaGus Ventures Fund, CRIA does not charge a management fee for any CRIA client assets invested in the Fund; i.e., these CRIA clients are not charged both a CRIA management fee and a fee by the applicable investment fund.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

CRIA, or individuals associated with CRIA, may buy or sell, for their personal account(s), investment products identical to those recommended to clients. It is the expressed policy of CRIA that no person employed by CRIA may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, therefore preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations may represent a conflict of interest, CRIA has established the following restrictions in order to ensure its fiduciary responsibilities:

- CRIA emphasizes the unrestricted right of the client to specify investment objectives, guidelines, and/or conditions on the overall management of their account. CRIA's standard investment process begins with reviewing applicable state statutes, investment policy, and permitted investment language provided by the client.

- Associated persons or their immediate family members shall not buy or sell securities for their personal portfolio(s) where their decision is derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public on reasonable inquiry. No associated person of CRIA shall prefer his or her own interest to that of the advisory client.
- CRIA and its employees may not participate in private placements or initial public offerings (IPOs) without pre-clearance from CRIA's Compliance Officer.
- CRIA requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- Records will be maintained of all securities bought or sold by CRIA, associated persons of CRIA, and related entities. Armand C. Spaziano will review these records on a regular basis.
- Any individual not in observance of the above may be subject to termination.

Further, CRIA has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. CRIA's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth CRIA's practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with CRIA may buy or sell securities for their personal accounts that are identical or different than those recommended to clients. It is the expressed policy of CRIA that no person employed by CRIA shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, CRIA requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the CRIA's principal. CRIA also requires such access persons to receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

CRIA's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information. CRIA requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

CRIA will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Item 12 – Brokerage Practices

For CRIA portfolio management clients in need of brokerage or custodial services in conjunction with CRIA advisory services, and depending on client circumstances and needs, CRIA may recommend the use of TD Ameritrade or SEI. We have evaluated these custodians/brokers and believe that they will provide our clients with an appropriate blend of execution services, commission costs and professionalism.

How We Select Brokers and Custodians to Recommend

We seek to select a custodian/broker who will hold our clients' assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for the custody)
- Capability to execute, clear, and settle trades (buy and sell securities for the client's account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below

We generally trade through the directed custodian/broker regardless of whether a client has an active prime brokerage agreement in place allowing us to use outside brokers. As a result, it should be understood that we will likely not negotiate commissions or obtain volume discounts beyond those already offered by the custodian/broker. We believe that, given the additional costs of using outside brokers along with our own custodians' resources and commitment to

providing appropriate execution, we are fulfilling our obligation to seek best execution by trading directly through them. In addition, we independently review the execution of the custodians on a periodic basis and also review their own internal documentation of their trading capabilities. However, CRIA clients must evaluate these brokers before opening an account.

Although clients may have selected a custodian/broker and we generally trade through their designated broker, we will not trade through the custodian/broker if we reasonably believe that it may result in a breach of our fiduciary duty. For example, we may use an outside broker for fixed income transactions if we think it is in the client's best interests and if the client has executed a prime brokerage agreement.

Please note that because we will be executing most, if not all, transactions through the directed custodian/broker, a disparity may exist between the commissions borne by the client's account and the commissions borne by our other clients that direct us to use another particular broker-dealer. While we are comfortable with the custodians we utilize, you should note that some differences may exist based on the assets our clients maintain at each. You may forego benefits that we may be able to obtain for other clients through, for example, negotiating volume discounts or block trades if your assets are held at our smaller custodial relationship. This may come into play if you are part of a smaller group at one custodian, while we have a larger number of clients at a different custodian.

Your Brokerage and Custody Costs

For our clients' accounts that the broker/custodian maintains, they generally do not charge the client separately for custody services but are compensated by charging the client commissions or other fees on trades that it executes or that settle into the client's account. In addition, the custodian/broker may charge the client a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into the client's TD Ameritrade account. These fees are in addition to the commissions or other compensation the client pays the executing broker-dealer. Because of this, in order to minimize the client's trading costs and because of the execution we think our custodian provides, we execute most trades for the client's account through the custodian.

We have determined that having the client's custodian execute most trades is consistent with our duty to seek "best execution" of the client's trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Clients may request that brokerage transactions to be directed to a particular broker or dealer other than TD Ameritrade or SEI. However, if CRIA believes that the use of that broker dealer would hinder CRIA in meeting its fiduciary obligations, CRIA will not be able to accept the account.

We may engage in "block trading" when advantageous to clients. This means that we purchase a large block of shares and then allocate those shares among the participating client accounts. Regarding aggregated "block trades," we operate so that no advisory account will be favored over any other account participating in the aggregated order. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared based on their participation in the trade within the same group of clients at the same custodian.

Item 13 – Review of Accounts

Armand C. Spaziano, President/Member/Chief Compliance Officer, will monitor client accounts on a continuous basis. Each account will be formally reviewed at least annually by the IAR assigned to the account. Any material change in the client's financial circumstances will trigger an additional review of a client's account.

Such changes might include, but are not limited to, the following: changes in economic conditions, changes in the client's financial situation or investment objectives, and the client's request for an additional review of the account.

Armand C. Spaziano, CFA is responsible for the overall investment direction of CRIA. Accounts are reviewed for asset allocation and holdings for each portfolio, taking into consideration the account's investment objectives, account restrictions and client-directed trades/holdings.

Reports:

Reports are sent to clients on a quarterly basis. The Portfolio Appraisal Report provides the cost and market value of each security held and the percentage that each security represents of the total portfolio. The Transaction Summary provides a summary of all transactions for an account by trade date. The Performance Report provides a summary of account activity and the initial rate of return for the period. These reports are in addition to the monthly account statements and brokerage confirmations sent directly to the client by the custodian and broker.

Item 14 – Client Referrals and Other Compensation

Participation or Interest in Client Transactions

Unless the client account is managed on a non-discretionary basis, CRIA determines the broker/dealer to be used in each specific transaction with the objective of negotiating the best execution available.

While net price is a major consideration in best execution, CRIA will also take into account the quality of brokerage services, confidentiality, financial stability, and responsiveness, among others.

From time to time, CRIA may recommend to certain suitable and sophisticated CRIA clients that they purchase or sell a limited partnership or fund interest, including an interest in SpaGus Ventures Fund, LLC, which is an affiliated fund of Mr. Armand Spaziano, a CRIA related person. Mr. Armand Spaziano would receive compensation different from, and in addition to, any CRIA advisory fee.

Because compensation is generated on such a purchase or sale of the interest, CRIA will provide full disclosure to the CRIA client of the compensation prior to execution of the transaction, and will only make these recommendations to suitable and sophisticated CRIA clients. CRIA will provide this full disclosure on the compensation structure to mitigate the potential conflict of interest that may arise due to the additional fee to the CRIA client and for CRIA's related person. CRIA clients are not under any obligation to proceed with the purchase or sale, and the decision to invest in any fund rests entirely with the CRIA client.

Compensation to Solicitors

CRIA maintains referral arrangements (Solicitor's Agreements) with non-employee, (outside) consultants, who may refer clients to CRIA. Such Solicitors may receive compensation from CRIA, in compliance with the requirements set forth in Rule 206(4)-3 of the Investment Advisers Act of 1940 (Solicitors Rule), requiring that the relationship and compensation between the solicitor and CRIA be disclosed to the client at the time of the solicitation or referral. Under these arrangements, the client does not pay fees higher than CRIA's normal and typical advisory fees.

In those cases where CRIA recommends that clients utilize a separate managed account with a different advisor, the client may pay additional fees to that managing advisor on par with the internal management fees incurred within a similar strategy of a mutual fund.

In any case, applicable state laws may require these persons to become licensed, either as investment advisory representatives of CRIA or as an independent investment advisor. CRIA will request that its clients acknowledge this arrangement prior to acceptance of the clients' account for advisory services.

Additional Compensation

As also referenced in **Item 12**, CRIA may recommend that clients establish brokerage accounts with TD Ameritrade, a registered broker/dealer, member SIPC/NYSE, to maintain custody of clients' assets and to effect trades for their accounts.

TD Ameritrade provides CRIA with access to its trading and operational services, which are typically not available to TD Ameritrade retail investors. The services generally are available to independent investment advisers at no charge to them as long as a total of at least \$10 million of CRIA's account assets are maintained at TD Ameritrade. TD Ameritrade's services include research, brokerage, custody, access to mutual funds, and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.

TD Ameritrade also makes available to CRIA other products and services that benefit CRIA, but may not directly benefit its clients' accounts. Some of these products and services assist CRIA in managing and administering clients' accounts. These include software and other technology that provide access to client account data, such as trade confirmations and account statements, facilitating trade execution, and allocation of aggregated trade orders from multiple client accounts, and assisting with back-office support, such as recordkeeping and client reporting.

Many of these services generally may be used to service all, or a substantial number of CRIA's accounts, including accounts not maintained at TD Ameritrade. TD Ameritrade may also provide CRIA with other services intended to help CRIA manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing.

In addition, TD Ameritrade may make available, arrange and/or pay for these types of services to CRIA by independent third parties. TD Ameritrade may discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third party providing these services to CRIA. The availability to CRIA of the foregoing products and services is not contingent upon CRIA committing to TD Ameritrade any specified amount of business, such as assets in custody or trading volume.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker/dealer, bank or other qualified custodian that holds and maintains clients' investment assets. CRIA urges clients to carefully review such statements and compare such official custodial records to the account statements that CRIA may provide to clients. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Additionally, we do not request fees in excess of \$500 more than six months in advance of services rendered.

All client accounts are held at separate, un-affiliated custodians. However, due to the affiliation Mr. Armand Spaziano has with SpaGus Ventures Fund, LLC, CRIA is considered to hold custody of those client assets invested in SpaGus Ventures Fund, LLC. SpaGus Ventures Fund, LLC is closed to new investors.

Item 16 – Investment Discretion

Portfolio Management Services

With respect to portfolio management services, clients generally grant CRIA discretion over the selection and amount of securities to be bought or sold for their accounts, without obtaining their prior consent or approval. However, CRIA's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry. Clients may amend these limitations as required and such amendments must be submitted in writing.

Item 17 – Voting Client Securities

CRIA will not vote proxies on behalf of clients. CRIA may, on rare occasions and only at the client's request, offer clients advice regarding corporate actions and the exercise of proxy voting rights. However, the final decision on how to vote the proxy rests with the client or plan sponsor.

Clients will receive applicable proxies directly from the custodian of the clients' investment portfolios.

CRIA has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. Additionally, CRIA has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Lastly, CRIA has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured because of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients or plans CRIA may advise.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about CRIA's financial condition. CRIA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

The principal executive officer and management person of CRIA is Armand C. Spaziano. Please see the **Part 2B of Form ADV: Brochure Supplement(s)** for additional information about the education and business background of the principal of CRIA.

As stated in **Item 6 – Performance-Based Fees and Side-By-Side Management**, CRIA does not charge performance-based fees. Additionally, no management persons of CRIA have been found liable in any arbitration claims alleging damages in excess of \$2,500, nor have been found liable in any civil proceeding. Please see the **Part 2B of Form ADV: Brochure Supplement(s)** for additional information about issues related to self-regulatory organization and administrative proceedings related to some CRIA adviser representatives.

Please see **Item 10– Other Financial Industry Activities and Affiliations** for all information about any relationships or arrangements any CRIA management persons have with any issuer of securities. There is no other applicable information about management persons of CRIA to be reported here in **Item 19**.

Part 2B of Form ADV: Brochure Supplement – Armand C. Spaziano

Item 1 – Cover Page

**Armand C. Spaziano
Creative Resources Investment Advisors, LLC**

**85 Tollgate Road
Warwick RI, 02886
401-738-0070**

March 18, 2019

This Brochure Supplement provides information about Armand C. Spaziano that supplements Creative Resources Investment Advisors, LLC's (CRIA's) Brochure. You should have received a copy of that Brochure. Please contact Mr. Armand Spaziano if you did not receive CRIA's Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Mr. Armand Spaziano is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

**Armand C. Spaziano
Year of Birth: 1967**

Education:

- B. S. University of Rhode Island, Kingston, Business, 1989.
- Chartered Financial Analyst (CFA), Institute of Chartered Financial Analysts, Charlottesville, VA, 2000.

Business Experience:

- Creative Resources Investment Advisors, LLC, President/Member/Chief Compliance Officer/Registered Adviser, 5/2017 to Present.

- Creative Resources Investment Advisors, LLC, Vice President/Member/Chief Compliance Officer/Registered Adviser, 8/1996 to 5/2017.
- SpaGus Capital Partners, LLC, President/Member, 11/2010 to Present.
- Roman Capital Partners, LLC, President/Member, 7/2007 to Present.
- H. Beck Inc., Registered Representative, 7/2008 to 7/2009.
- Creative Resources Broker Services, LLC, Registered Representative, 7/1999 to 1/2009.

Additional Information About The CFA Designation

Issued by: CFA Institute

Prerequisites/Experience Required:

Candidate must meet one of the following requirements:

- Undergraduate degree and four years of professional experience involving investment decision-making, or
- Four years qualified work experience (full time, but not necessarily investment related).

Educational Requirements: Self-study program (250 hours of study for each of the 3 levels)

Examination Type: Three course exams

Continuing Education/Experience Requirements: None

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

The following describes Mr. Armand Spaziano's engagements in investment related businesses.

Roman Capital Partners, LLC

Mr. Armand Spaziano is President of Roman Capital Partners, LLC, which offers alternative investment evaluations, and consultation services. This entity is also a conduit for fixed

indexed annuity product commissions earned by Mr. Armand C. Spaziano.

Mr. Armand Spaziano, in his separate capacity as an insurance agent or broker, will be able to effect securities transactions and/or purchase investment products (insurance) for investment advisory clients, for which he will receive separate, yet customary compensation. CRIA clients, however, are not under any obligation to engage Mr. Armand Spaziano and/or Roman Capital Partners LLC when considering implementation of advisory recommendations and may use the insurance brokerage firm and agent of their choosing. The implementation of any or all recommendations is solely at the discretion of the CRIA client. While Mr. Armand Spaziano endeavors at all times to put the interest of the CRIA clients first as part of CRIA's fiduciary duty, CRIA clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of Mr. Armand Spaziano when making recommendations. CRIA clients are expressly instructed that the fees paid to CRIA for advisory services are separate and distinct from the commissions earned for placing the CRIA client in insurance products.

SpaGus Capital Partners, LLC

Mr. Armand Spaziano is the sole owner of SpaGus Capital Partners, LLC, which manages SpaGus Ventures LLC. SpaGus Ventures LLC is a private investment fund open only to accredited investors providing both debt and equity capital for small, privately held firms seeking to obtain higher than average rate of returns achieved by the active management of the firms' investments and assets. SpaGus Ventures Fund, LLC is closed to new investors. Although some CRIA clients are invested in the Fund, CRIA does not charge a management fee for any CRIA client assets invested in the Fund, i.e., these CRIA clients are not charged both a CRIA management fee and a fee by the Fund. As part of his responsibilities to manage the Fund's investments, Mr. Armand Spaziano may assist in the management of the Fund's portfolio companies.

See the **Form ADV Part 2A – Firm Brochure** for additional details.

Mr. Spaziano's principal business activities, and the approximate amount of his time allotted to each is as follows:

- Giving investment advice and investment management – 90%
- Other financial services activities, including work through Roman Capital Partners LLC and SpaGus Capital Partners LLC – 10%

Item 5- Additional Compensation

Mr. Armand C. Spaziano earns additional compensation from the activities set forth in **Item 4**.

Item 6 - Supervision

As CRIA's Principal, Armand C. Spaziano is responsible for all employee supervision and the general business strategy of the firm. He also formulates and monitors the investment advice CRIA offers to clients, oversees all material investment policy changes, and reviews client accounts to ensure that objectives and mandates are being met.

As the Chief Compliance Officer, Armand C. Spaziano is responsible for monitoring and enforcing compliance with state and other regulatory requirements, with our policies and procedures, Code of Ethics, and employee rules of conduct. Mr. Spaziano can be reached at 401-738-0070.

Item 7 - Requirements for State-Registered Advisers

State registered advisers are required to disclose all material facts regarding certain arbitration events, proceedings, or bankruptcy petitions. No information is applicable to this Item for Mr. Armand C. Spaziano.

Part 2B of Form ADV: Brochure Supplement – Theodore R. Augustyniak

Item 1 – Cover Page

THEODORE R. AUGUSTYNIAK

Creative Resources Investment Advisors, LLC

10 S. Riverside Drive

Suite 875

Chicago, IL 60606

312-498-8682

March 18, 2019

This Brochure Supplement provides information about Theodore R. Augustyniak that supplements Creative Resources Investment Advisors, LLC's (CRIA's) Brochure. You should have received a copy of CRIA's Brochure. Please contact Mr. Armand C. Spaziano at (401) 738-0070 if you did not receive CRIA's Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Mr. Theodore R. Augustyniak is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Theodore Richard Augustyniak

Year of Birth: 1982

Education:

- B.S., Northeastern Illinois University, Business Administration, 2007.

Business Experience:

- Legend Advance Funding, Consulting, 5/2017 to Present

- Augustyniak Insurance Agency, Inc., Owner/Insurance Agent, 4/2017 to Present
- Creative Resources Investment Advisors, LLC, Investment Adviser Representative, 3/2015 to Present.
- Legend Securities Inc., Registered Representative, 2/2015 to 2/2016.
- Newport Coast Asset Management, Inc., CCO, 9/2014 to 02/2015
- Newport Coast Securities, Inc., Account Executive, 8/2013 to 2/2015
- Ariston Wealth Management, Advisor Representative, 4/2012 to 8/2013
- Meyers Associates, LP, Registered Representative, 11/2011 to 8/2013
- Anderson & Strudwick, Registered Representative, 7/2010 to 11/2011
- Jesup & Lamont Securities, Registered Representative, 6/2009 to 7/2010
- Brewer Financial Services, Registered Representative, 5/2009 to 6/2009
- Interocean Securities, LLC, Registered Representative, 8/2007 to 5/2009

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Mr. Augustyniak has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov. Clients can access this disciplinary history by entering Mr. Augustyniak's name or his CRD number, which is #5082577.

Item 4- Other Business Activities

Mr. Augustyniak spends his time in other business matters allocated as follows:

- Insurance Agent through Augustyniak Insurance Agency for Farmers Insurance Group – Approximately 140 hours per month
- Consulting for merchant funding for Legend Advance Funding – Approximately 2 hours per month

Mr. Augustyniak, in his separate capacity as an insurance agent or broker, will be able to effect securities transactions and/or purchase investment products (insurance) for financial planning clients, for which he will receive separate, yet customary compensation. CRIA clients, however, are not under any obligation to engage Mr. Augustyniak when considering implementation of advisory recommendations and may use the insurance brokerage firm and agent of their choosing. The implementation of any or all recommendations is solely at the discretion of the CRIA client.

While Mr. Augustyniak endeavors at all times to put the interest of the CRIA clients first as part of CRIA's fiduciary duty, CRIA clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of Mr. Augustyniak when making recommendations. CRIA clients are expressly instructed that the fees paid to CRIA for advisory services are separate and distinct from the commissions earned for placing the CRIA client in insurance products.

Item 5- Additional Compensation

Mr. Augustyniak may receive compensation from Farmers Insurance Group, in the form of insurance commissions. In addition, Mr. Augustyniak may receive trail commissions on insurance policies or securities sold through this entity. To the extent that such activities create an incentive for Mr. Augustyniak to recommend investment products based on the compensation received, rather than on a client's needs, this creates a material conflict of interest. To mitigate this conflict of interest, CRIA has adopted policies and procedures to ensure that Mr. Augustyniak adheres to his fiduciary duty to put client interests ahead of other interests (such as receiving insurance commissions or other trails) by periodically monitoring and reviewing his receipt of such compensation.

Mr. Augustyniak may receive compensation from Legend Advance Funding in the form of management and/or consulting fees.

Item 6 - Supervision

Mr. Augustyniak is an Investment Adviser of CRIA and he provides investment advice to CRIA clients. Mr. Augustyniak is supervised by the owner of CRIA, Armand C. Spaziano. Mr. Augustyniak's client accounts are subject to regular review and verification that asset balances are being managed in accordance with a client's investment guidelines.

As CRIA's Principal, Armand C. Spaziano is responsible for all employee supervision and the general business strategy of the firm. He also formulates and monitors the investment advice CRIA offers to clients, oversees all material investment policy changes, and reviews client accounts to ensure that objectives and mandates are being met.

As the Chief Compliance Officer, Armand C. Spaziano is responsible for monitoring and enforcing compliance with state and other regulatory requirements, with our policies and procedures, Code of Ethics, and employee rules of conduct. Mr. Spaziano can be reached at 401-738-0070.

Item 7 – Requirements for State-Registered Advisers

State registered advisers are required to disclose all material facts regarding certain arbitration events, proceedings, or bankruptcy petitions. Information is applicable to this item for Mr. Augustyniak. The details can be found on FINRA's BrokerCheck system or the IAPD. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov. Clients can access this disciplinary history by entering Mr. Augustyniak's name or his CRD number, which is #5082577.

Part 2B of Form ADV: Brochure Supplement – Bradford D. Szczecinski

Item 1 – Cover Page

BRADFORD D. SZCZECINSKI

Creative Resources Investment Advisors, LLC

10 S. Riverside Drive

Suite 875

Chicago, IL 60606

312-498-8682

March 18, 2019

This Brochure Supplement provides information about Bradford D. Szczecinski that supplements Creative Resources Investment Advisors, LLC's (CRIA's) Brochure. You should have received a copy of CRIA's Brochure. Please contact Mr. Armand C. Spaziano at (401) 738-0070 if you did not receive CRIA's Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Mr. Bradford D. Szczecinski is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Bradford Dale Szczecinski

Year of Birth: 1967

Education:

- B.S., University of Toledo, Finance, 1990.

Business Experience:

- Legend Advance Funding, Consulting, 5/2017 to Present
- Creative Resources Investment Advisors, LLC, Investment Adviser Representative, 3/2015 to Present.
- Legend Securities Inc., Registered Representative, 3/2015 to 2/2016
- Newport Coast Asset Management, Inc., President, 8/2013 to 03/2015
- Newport Coast Securities, Inc., Account Executive, 08/2013 to 03/2015
- Ariston Wealth Management, Advisor Representative, 4/2012 – 8/2013
- Meyer Associates, LP, Registered Representative, 11/2011 – 8/2013
- Anderson & Strudwick, Registered Representative, 7/2010 – 11/2011
- Jesup & Lamont Securities Corp, Senior Vice President, 7/2009 – 7/2010
- InterOcean Wealth Management, LLC, Vice President, 7/2007 – 7/2009

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Mr. Szczecinski has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov. Clients can access this disciplinary history by entering Mr. Szczecinski's name or his CRD number, which is #2102955.

Item 4- Other Business Activities

Mr. Szczecinski spends his time in business matters allocated as follows:

- Consultant for merchant funding at Legend Advance Funding – 2 hours per month
- Advisor at TRACT Therapeutics, Inc. – 3 hours per month
- Financial Educator at PWC, accounting and audit firm – up to 30 hours a week.
- Board President of Team Illinois - Transplant Games of America (volunteer position)– 2 to 4 hours per month
- Volunteer at Breakthrough Urban Ministries, planned giving consulting – 2 - 4 hours per month
- Board Member at Northwestern Memorial Hospital – up to 4 hours per month

Item 5- Additional Compensation

Mr. Szczecinski may receive compensation from True Communications, Legend Advance Funding, and TRACT in the form of management and/or consulting fees.

Item 6 - Supervision

Mr. Szczecinski is an Investment Adviser of CRIA and he provides investment advice to CRIA clients. Mr. Szczecinski is supervised by the owner of CRIA, Armand C. Spaziano. Mr. Szczecinski's client accounts are subject to regular review and verification that asset balances are being managed in accordance with a client's investment guidelines.

As CRIA's Principal, Armand C. Spaziano is responsible for all employee supervision and the general business strategy of the firm. He also formulates and monitors the investment advice CRIA offers to clients, oversees all material investment policy changes, and reviews client accounts to ensure that objectives and mandates are being met.

As the Chief Compliance Officer, Armand C. Spaziano is responsible for monitoring and enforcing compliance with state and other regulatory requirements, with our policies and procedures, Code of Ethics, and employee rules of conduct. Mr. Spaziano can be reached at 401-738-0070.

Item 7 – Requirements for State-Registered Advisers

State registered advisers are required to disclose all material facts regarding certain arbitration events, proceedings, or bankruptcy petitions. Information is applicable to this item for Mr. Szczecinski. The details can be found on FINRA's BrokerCheck system or the IAPD. The BrokerCheck link is www.finra.org/brokercheck; the IAPD link is www.adviserinfo.sec.gov. Clients can access this disciplinary history by entering Mr. Szczecinski's name or his CRD number, which is #2102955.