

Starship Securities LLC  
Form Customer Relationship Summary (CRS)  
June 30, 2020

Starship Securities LLC (“Starship” or “we” or “our”) is registered with the Securities and Exchange Commission (the “SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

***What investment services and advice can you provide me?***

Starship offers web-based, discretionary investment advisory services to retail investors (hereinafter “clients”) that maintain a Health Savings Account (“HSA”) with its affiliate, Brighter Financial Inc. We offer advisory accounts to our clients called wrap fee programs solely through an application. Starship utilizes the information from an investor questionnaire to tailor its investment recommendations in accordance with each client’s investment risk and financial parameters and objectives. Starship provides investment advice only with respect to a limited type of investment, exchange traded funds (“ETFs”). Starship’s wrap fee program offers three model portfolios that each include different allocations of ETFs.

Starship has discretionary authority over client accounts, which means that we are allowed to buy and sell investments in client accounts, without asking clients in advance. This authority is ongoing, and similar to portfolio reviews (discussed further immediately below), may be triggered by material changes in variables such as a client’s investment risk, financial parameters and objectives, as well as the market, political and economic environment. Starship requires that its clients use DriveWealth LLC (“DriveWealth”) as their independent custodian, and for clearing and execution services. We do not have minimum account or investment amount requirements.

Starship monitors client accounts on a periodic basis using commercially available software. Starship reviews the curated portfolios not less than quarterly, to ensure that they are in line with the parameters of the models. The portfolios are also reviewed periodically to ensure that the selected model remains suitable for each client.

For additional information regarding our services, please see Starship’s Form ADV, Part 2A, which is available at [starshiphsa.com/adv2](http://starshiphsa.com/adv2) and on the SEC’s IAPD database at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

<b><i>CONVERSATION STARTERS: Ask your financial professional:</i></b>
<i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>
<i>How will you choose investments to recommend to me?</i>
<i>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</i>

***What fees will I pay?***

Starship charges a fixed fee of \$1.00 per month for all client accounts that have funds in their investment accounts. Starship also charges certain client accounts a monthly fee based on the percentage of assets under its management. For client accounts with average daily balances in their investment account \$5,000.00 or more as of the last day of the month, Starship charges an additional annual investment advisory fee of 0.35% of the amount \$5,000.00 or more. Fees are charged monthly in arrears and are not negotiable.

Under the wrap fee program, the asset-based fee includes most transaction costs and fees paid to DriveWealth, which holds your assets (called “custody”), and as a result wrap fees are typically higher than non-wrap advisory fees. Although transaction fees are usually included in the wrap program fee, sometimes you will pay an additional transaction fee (for investments bought and sold outside the wrap fee program).

Due to the nature of the fees assessed under this wrap fee program, the more assets there are in a client’s account, the more a client will pay in fees. Therefore, Starship has an incentive to encourage clients to increase the assets in their accounts.

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Starship's wrap fee program includes all trade charges applicable to client accounts. It does not include other related costs and expenses. A client may incur certain charges imposed by other third parties (e.g., transfer fees, administrative fees, other fees). Issuers of ETFs purchased for clients charge fees and expenses that affect clients.

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 our fees, please see Starship's Form ADV, Part 2A, which is available at [starshiphsa.com/adv2](http://starshiphsa.com/adv2) and at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**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 this means:

- We earn a fee based on the amount in client accounts and therefore may be incented to encourage clients to set their minimum overflow threshold in their HSA lower in order to increase our fee.

**CONVERSATION STARTER:** Ask your financial professional:

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

For additional information regarding our conflicts of interest, please see Starship's Form ADV, Part 2A, which is available at [starshiphsa.com/adv2](http://starshiphsa.com/adv2) and [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Our financial professionals receive a salary from Starship.

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

No. Neither Starship nor its financial professionals have reportable legal or disciplinary events. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research Starship and our financial professionals.

**CONVERSATION STARTER:** Ask your financial professional:

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

For additional information about our investment advisory services, please see Starship's Form ADV, Part 2A, which is available at [starshiphsa.com/adv2](http://starshiphsa.com/adv2) and [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). If you would like additional, up-to-date information or a copy of this disclosure, please call 1-866-340-4467.

**CONVERSATION STARTER:** Ask your financial professional:

*Who is my primary contact person? Is he or she a representative of an investment adviser? Who can I talk to if I have concerns about how this person is treating me?*