

DHH Advisors, LLC, d/b/a EKS Associates

We are registered with the Securities and Exchange Commission (SEC) as an investment adviser. 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](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?***

We offer wealth management services to retail investors, which include financial planning and portfolio management services. We provide advice regarding your investment goals and objectives, personal balance sheet, tax planning, risk management, retirement, education, cash flow and investment planning. We will continuously monitor your investment accounts that are being overseen by us. Our services include ongoing financial counseling, account review and monitoring, securities research and other advisory services related to investments. Our portfolio management services are offered on a discretionary or non-discretionary basis. If we are granted discretionary authority by the contract you sign, we will determine the securities to be bought or sold as well as the amount to be bought or sold. If we do not have discretionary authorization, we will provide you with recommendations and will execute the trades only after we receive your approval. We do not require an account minimum.

Additional Information: See more detailed information in our Form ADV, Part 2A brochure (Items 4 and 7).

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?

Item 3. **Fees, Costs, Conflicts, and Standards of Conduct*****What fees will I pay?***

Financial planning fees are currently billed at a rate of \$400 per hour or a flat fee for services rendered. Depending on the information outlined in your Client Agreement, you will be billed either quarterly, semi-annually or annually. Our fees may differ from client to client; however, our fees are generally non-negotiable.

The annual fee for investment advisory services shall not be more than 1.5% of the market value of the assets under our management. This means that the more assets that are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase, or not to take actions that would decrease, the assets in your account. Our investment advisory fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses which will be incurred by your account. However, we do not receive any portion of those commissions, fees and costs. 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.

Additional Information: See more detailed information in our Form ADV, Part 2A brochure (Item 5).

Conversation Starters:

- Help me understand how these fees and costs might affect my investment. 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 must act in your best interest and not put our interests 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 is an example to help you understand what this means:

Charles Schwab & Co., Inc. ("Schwab") is our choice for custody and brokerage services. In evaluating whether to recommend Schwab to our clients, we may take into account the availability of the products and services available from them and not solely the nature, cost or quality of custody and brokerage services provided by Schwab. These products and services may be used for all of our clients or may benefit us. This is a conflict that comes out of how we service clients.

One of our associated persons is a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS") which is a broker dealer registered with the SEC and as such has the ability to accept compensation for the sale of securities or other investment products. However, as a fee-only firm, we will not sell investment products that generate a commission.

Conversation Starters:

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

Additional Information: See more detailed information in our Form ADV, Part 2A brochure (Items 10-12, 14).

How do your financial professionals make money?

Our financial professionals are compensated by a salary and bonus structure. They are not compensated on factors such as amount of client assets they service, time and complexity required to meet a client's needs or the revenue we earn from their advisory services.

Item 4. **Disciplinary History**

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

No, our firm and our financial professionals do not have any legal or disciplinary history to disclose.

Conversation Starters:

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

Item 5. **Additional Information**

You can find additional information about our firm and the services we provide on our website www.eksassociates.com and www.investors.gov/CRS. Additionally, you can contact us at 973-740-2400 or thagberg@eksassociates.com to request more or up-to-date information and a copy of our Form CRS.

Conversation Starters:

- 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?

EKS ASSOCIATES

Fee-Only Comprehensive Financial Life Planning

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September 2023

Form ADV Part 2A Brochure

This brochure provides information about the qualifications and business practices of EKS Associates. If you have any questions about the contents of this brochure, please contact us at 609-921-1016 or 973-740-2400. 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.

Additional information about EKS Associates also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for EKS Associates is 169687.

EKS Associates is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority, or the use of the term "registered" does not imply a certain level of skill or training.

Item 2: Material Changes

This Item of the Brochure discusses only specific material changes that are made to the Brochure since the last update and provides clients with a summary of such changes. The last update of our Brochure was March 31, 2023.

Our current Brochure contains the following material change:

Any language related to *TD Ameritrade* providing custodial services has been removed. All accounts of *EKS Associates* that were custodied at *TD Ameritrade* have now been transferred to *Charles Schwab* as part of the merger of the two companies.

Clients may request a copy of the Form ADV Part 2A at any time without charge by sending a written request to our Chief Compliance Officer at 601 Ewing Street, Suite A-7, Princeton, NJ 08540 or by e-mail to thagberg@EKSassociates.com.

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Item 4: Advisory Business

The United States Securities and Exchange Commission granted the investment adviser registration of EKS Associates (“EKS”) on August 26, 2014. The company was formed in October 2013. The firm’s principal owners are Darren Zagarola (CRD # 5121491), Howard Milove (CRD # 3230483) and Howard Hook (CRD # 4199828). Tracy A. Hagberg (CRD Number 1841992) is Chief Compliance Officer of the firm. The firm is not publicly owned or traded. The firm manages each client’s portfolio on an individualized basis, tailoring our services to the individual needs of clients. Clients may impose restrictions on investing in certain securities or types of securities. The firm does not sponsor any wrap programs. The amount of our assets under management as of December 31, 2022, is \$278,761,107 which represents 495 accounts.

Financial Planning

We offer our clients a comprehensive range of financial planning services that are tailored to their specific needs and goals. Through a thorough analysis of their financial resources, we provide our clients with personalized financial programs that cover their present and future assets and liabilities, including insurance, savings, investments, and retirement benefits.

Our financial planning services go beyond providing general recommendations for our clients. We provide specific actions that clients can take to achieve their financial objectives, such as acquiring insurance coverage, setting up an individual retirement account, or investing in certain securities. We also offer ongoing financial counseling, account reviews, securities research, and other advisory services related to investments.

If needed, we can recommend the services of other professionals to implement our recommendations. However, our clients are not obligated to use any recommended professionals, and they retain absolute discretion over all such decisions.

The scope of our financial planning services is outlined in the *Financial Planning Agreement (“Agreement”)* that clients sign with us. We strongly encourage our clients to renew their financial planning services annually to review and update our previous recommendations and services, ensuring that their financial plans remain aligned with their evolving needs and goals.

Investment Implementation and Management

At times, we offer customized investment implementation services to our clients. We take the responsibility of making recommendations based on their financial plan and specific needs. After making recommendations, if our clients accept them, we implement them by executing the purchase or sale. However, we do not exercise discretionary authority, meaning all recommendations require approval from the client before implementation.

The *Client Agreement* that clients sign with us outlines the investment implementation and asset management services we offer. This agreement ensures transparency and clarity in our services, allowing clients to understand the scope and terms of our engagement.

Investment Advisory Services

We offer investment advisory services aimed at constructing portfolios that achieve the highest possible returns without exceeding the client's risk tolerance. We review the client's asset allocation and provide advice on it, including regular supervisory and management services, economic advisory letters, articles, and other written materials. We monitor the client's investments and provide guidance on the investment and reinvestment of designated assets.

Our investment advisory services do not require a minimum account balance. The annual fee for these services will not exceed 1.5% of the market value of assets and will be negotiated and agreed upon when the *Investment Advisory Management Agreement ("Advisory Agreement")* is signed. The fees are paid monthly or quarterly in advance. The *Advisory Agreement* can be terminated by either the client or us at any time by written notice.

Our investment advisory services can be provided on a discretionary or non-discretionary basis, as specified in the *Advisory Agreement*. If the client has given authorization, we use our discretion to determine the securities to be bought or sold and the amount. However, if the client has not given authorization, we will only execute transactions with the client's prior approval after providing recommendations.

We strive to provide investment advisory services that meet our clients' specific needs and goals. Our investment approach is transparent, and we prioritize clear communication with our clients to ensure that they understand the services and fees involved.

Item 5: Fees and Compensation

The firm offers its services at a compensation based on either an hourly rate or flat fee, as outlined in the *Financial Planning Agreement ("Agreement")*. Financial Planning fees are billed at a rate of \$400 per hour or a flat fee for services rendered, depending on the information outlined in the *Agreement*. The billing frequency will also be specified in the *Agreement*, which can be terminated at any time. If the contract is terminated within five business days of signing the *Agreement* or as otherwise required by law, a full refund of any fees paid will be made. The firm's fees may differ from client to client and are generally non-negotiable.

Clients may be subject to certain charges imposed by the custodians that hold their assets or that relate to holdings in a client's account, which are exclusive of and in addition to the fees charged by *EKS*. Such charges and fees include custodial fees, transaction fees, charges imposed directly by a mutual fund or exchange-traded fund ("ETF") in the account, deferred sales charges, wire transfer, and electronic fund fees. *EKS* does not receive any portion of these fees. For more information on Brokerage Practices, please refer to Item 12.

One of *EKS's* associated persons, Howard Milove, is a registered representative of Purshe Kaplan Sterling Investments ("PKS"), which is an SEC registered broker-dealer, Member of FINRA and the Municipal Rulemaking Board. Howard Milove will not accept compensation for the sale of securities or other investment products to the clients of *EKS*. Therefore, we do not believe that this arrangement creates a conflict of interest.

Item 6: Performance-Based Fees and Side-by-Side Management

Our firm does not charge performance-based fees, which are fees based on a share of capital gains or capital appreciation of the assets of a client. We believe that charging such fees may create conflicts of interest between our clients and us. Instead, our compensation is based on either an hourly rate or a flat fee, as outlined in our agreement with the client.

Item 7: Types of Clients

EKS offers its services to a wide range of clients, including individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. We are committed to providing personalized services that cater to the unique needs and goals of each client. While we do not require a minimum portfolio size, we do require all clients to enter into a formal services agreement that outlines the specific services to be provided.

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

We take a long-term approach to financial planning, considering a client's short-term cash needs, emergency fund, and insurance coverage before designing an investment strategy that aligns with their long-term financial goals.

Our goal is to ensure that our clients' investments are tailored to their financial objectives. To achieve future financial security, we create customized investment portfolios based on each client's cash needs and risk tolerance, using asset allocation techniques. Our preferred investment vehicles are mutual funds and ETFs, taking into account the client's existing investment holdings, whether or not they are managed by *EKS*. If necessary, we may recommend individual bonds or certificates of deposit to meet a client's cash needs. However, we do not recommend the purchase of individual stocks for a client's portfolio and will recommend selling a portion or all of any individual stock holdings if they represent greater than 10% of the total portfolio value.

Clients should be aware that investing in securities involves risk, and they should be prepared to bear potential losses.

Item 9: Disciplinary Information

We are obligated to inform our clients and prospective clients of any legal or disciplinary events that could materially affect their assessment of our advisory business or the integrity of our management. At this time, we have no disclosures that are required to be made under this Item.

Item 10: Other Financial Industry Activities and Affiliations

We are required to disclose any relationships or arrangements that are material to our advisory business with certain related persons.

Registered Representative of a Broker Dealer

As discussed in Items 5 and 12, Howard Milove, an *EKS* supervised person, is a registered representative of *PKS*. Please refer to those sections for additional disclosures related to this relationship.

Other Investment Adviser

Darren Zagarola, Howard Milove and Howard Hook are owners and Investment Advisory Representatives (IAR) of *Access Wealth*, an SEC registered investment adviser that provides financial planning and investment advisory services. *EKS* and *Access Wealth* have a business agreement, whereby *EKS* has hired *Access Wealth* to provide back-office and administrative services and support for a fee.

Tax Preparation

All associated persons of *EKS* are Certified Public Accountants (“CPAs”). Howard Hook prepares tax returns for individuals who are not clients of *EKS*. His tax business is not promoted through *EKS*. We do not believe that this outside business creates a material conflict of interest.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, *EKS* and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings.

Code of Ethics Description:

Our Code of Ethics is designed to ensure that we act with the highest standards of ethical behavior and professionalism. It is not intended to identify all possible conflicts of interest, and associated persons may still be liable for personal trading or other conduct that violates their fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below:

- Integrity – We shall offer and provide professional services ethically, honestly, and fairly.
- Objectivity – We shall be objective in providing professional services to clients.
- Competence – We shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which we are engaged.
- Fairness – We shall perform professional services in a manner that is fair and reasonable to clients and shall disclose conflicts of interest in providing such services.
- Confidentiality – We shall not disclose confidential client information without the specific consent of the client, except in response to proper legal process, or as required by law.

We periodically review and update our Code of Ethics to ensure that it remains current and relevant, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. We are happy to provide a copy of our Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

We and our related persons may buy or sell securities that are the same, similar, or different from those we recommend to clients. Recommendations may vary between clients due to differing objectives and risk tolerances. However, we ensure that neither we nor any related party receives preferential treatment over our clients.

Personal Trading

To avoid conflicts of interest, we may restrict or prohibit associates from trading certain securities. Any exceptions must be approved by our Chief Compliance Officer beforehand, and we keep records of all personal securities transactions as required by regulations.

Item 12: Brokerage Practices

Suggestion of Broker

Charles Schwab

We may suggest that clients open brokerage accounts with *Schwab* Institutional, which is a division of Charles *Schwab* & Co., Inc. ("*Schwab*"), a FINRA-registered broker-dealer and member of SIPC. While we may recommend *Schwab* as a custody option, the decision to custody assets with *Schwab* is ultimately up to the client. *EKS* is an independent and unaffiliated entity from *Schwab*.

Schwab provides *EKS* with institutional trading and custody services that are not typically available to retail investors. Independent investment advisors can typically access these services on an unsolicited basis, at no cost to them, provided that at least \$10 million of their clients' assets are held in accounts at *Schwab*. *EKS* is not required to commit to any specific amount of business with *Schwab* to access these services.

Schwab's brokerage services include trade execution, custody, research, and access to mutual funds and other investments typically only available to institutional investors or with a higher minimum initial investment.

Schwab does not generally charge separately for custody services for client accounts held in its custody. Instead, account holders are compensated through commissions and transaction-related or asset-based fees for securities trades executed through *Schwab* or settled into *Schwab* accounts.

In addition, *Schwab* offers *EKS* access to other products and services that may benefit *EKS* but not necessarily our clients' accounts. These products and services can be used to service all or a substantial number of our client accounts, including those not maintained at *Schwab*.

Schwab's products and services that assist us in managing and administering clients' accounts include software and other technologies that provide access to client account data, facilitate trade execution and allocation, provide research, pricing, and market data, facilitate payment of our fees from clients' accounts, and assist with back-office functions, record-keeping, and client reporting.

Schwab also offers other services to help us manage and grow our business, such as compliance, legal, and business consulting, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

Clients should be aware that *EKS* receives economic benefits through its participation in the *Schwab* Institutional program, which creates a potential conflict of interest and could influence our

recommendation of this firm for custody and brokerage services. However, we do not have any Soft Dollar Arrangements with *Schwab*.

It is important to note that one of *EKS's* associated persons, Howard Milove, is a registered representative of PKS and may accept compensation for the sale of securities or other investment products. While this may raise concerns about a conflict of interest, we do not believe it poses a conflict because Howard Milove will not sell commissionable products to *EKS* clients. Nonetheless, we remain committed to transparency and disclosing any potential conflicts of interest to our clients.

Item 13: Review of Accounts

When you engage our firm, we will determine the type of client you are: Quarterly Retainer, Semi-Annual Retainer, or Update.

As a Quarterly Retainer client, we'll review your situation quarterly, update your goals and financial condition, and make additional recommendations as needed.

As a Semi-Annual Retainer client, we'll review your situation semi-annually, update your goals and financial condition, and make additional recommendations as needed.

As an Update client, we'll meet as often as you'd like to update your goals and financial condition, and make additional recommendations as needed.

In all cases, we'll prepare and present a detailed written financial plan with initial thoughts and recommendations, and one of our three Investment Advisory Representatives (IAR) will conduct the reviews.

Item 14: Client Referrals and Other Compensation

We receive economic benefits from *Schwab* through the products and services they provide to independent investment advisors and their clients. These benefits are described in more detail in Item 12 - Brokerage Practices above, along with related conflicts of interest. It is important to note that these benefits are not tied to our specific investment advice or recommendations, such as the purchase of certain securities for our clients.

Item 15: Custody

According to government regulations, we may be considered to have custody of your assets if we are authorized to transfer your money to another person's account. However, the actual custody of your assets is held by *Schwab*. You will receive account statements from them directly, at least quarterly, via the email or postal address you provided. We recommend that you review those statements carefully upon receipt and compare them to the portfolio reports we provide.

Item 16: Investment Discretion

EKS may have the authority to exercise investment discretion on behalf of clients. This means that we can make transactions for clients without seeking their consent. Clients can grant us discretionary authority when they sign the *Advisory Agreement* but can limit this authority by providing us with written instructions. Clients can also amend these limitations by providing us with written instructions. As part of this authority, we will determine the securities to be purchased or sold, the amount of securities to be transacted, and the timing of when recommendations are implemented.

Item 17: Voting Client Securities

EKS does not vote proxies on behalf of clients as part of our firm policy. Clients are responsible for voting their own proxies, and proxies and solicitations are sent to clients directly by the custodian or issuing company. If a client requests assistance with voting proxies, we will provide recommendations to them. However, if a conflict of interest exists, we will disclose it to the client.

Item 18: Financial Information

EKS has the financial capability to meet its contractual commitments to clients. As we do not serve as a custodian for client funds or securities and do not require prepayment of fees of more than \$1,200 per client and six months or more in advance, a balance sheet is not required to be provided.

Item 19. Requirements for State Registered Advisers

Not applicable.

Item 20. Additional Information

EKS is the doing business as (dba) name of DHH Advisors, LLC.