Item 1: Introduction

GuruFocus Investments, LLC, is an investment adviser providing non-discretionary investment advice to the adviser to an Exchange-Traded Fund. GuruFocus.com, LLC provides financial news, research, as well as data and analytical tools through its website GuruFocus.com. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document provides a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

**What investment services and advice can you provide me?** GuruFocus.com, LLC provides financial news, research, and data and analytical tools to retail investors through its website GuruFocus.com. GuruFocus.com, LLC does not provide personalized investment advice; all content, opinions and recommendations are impersonal and are not tailored to meet individual subscribers’ investment needs. As part of our research subscription services, we have no access to, and therefore do not monitor, subscriber accounts. We do not limit the types of investments that we cover on GuruFocus.com. Investment minimums do not apply to subscription services. Please also see our Form ADV Part 2A at https://adviserinfo.sec.gov/firm/summary/316414, specifically Items 4 & 7.

**Questions to ask us:** 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 Standard of Conduct

**What fees will I pay?** Certain content on GuruFocus.com is free of charge. Subscription fees apply for Premium Membership and PremiumPlus Membership. Terms of service, subscriber rights, and restrictions are specified in the “Terms of Use” which are available on GuruFocus.com. The fees shown below cover a single Membership. An annual discount may be applied for each region added to the Premium Membership. Fees may be subject to change with advance notice in accordance with the Terms of Use. Premium Membership subscription fees are $449/year for US market, $399/year for Asian market, and $399/year for EU market. PremiumPlus Membership subscription fees are $849/year for US market. Subscription fees are generally payable annually in advance. Most subscribers pay by credit card, although in limited cases may pay by check, wire, or ACH. Premium and PremiumPlus Membership subscriptions automatically renew on the anniversary date of the original subscription date, unless terminated by the subscriber prior to the renewal date. GuruFocus.com offers a 7-day trial period at no cost to new subscribers. The paid Membership subscription period begins the day following the last day of the trial period, if applicable. Thereafter, if the subscription is canceled within six (6) months of the start date of the subscription, any pre-paid subscription fees are refunded pro rata for the number of days remaining in the subscription period. If the subscription is canceled after the 6-month period has passed, there is no refund due the subscriber, while access to paid content will continue until the last day of the subscription period. Other than the Membership fees outlined above, there are no other fees or expenses paid by subscribers to GuruFocus.com.
You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please see Item 5 of our Form ADV, available at https://adviserinfo.sec.gov/firm/summary/316414, for more information about fees and expenses.

Questions to ask us: 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: (1) GuruFocus.com’s content and communications may affect the prices of securities held by the Exchange-Traded Fund to which we indirectly serve as sub-adviser; and (2) We do not receive any compensation directly or indirectly from the Gurus tracked on GuruFocus.com, however Gurus are permitted to subscribe to GuruFocus.com Premium and/or PremiumPlus content. These facts may create a conflict of interest.

Questions to ask us: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the subscription services we provide to our subscribers. The Founder of GuruFocus Investments, LLC and GuruFocus.com, LLC receives a share of corporate profits. Please also see Item 10 of our Form ADV for additional details at https://adviserinfo.sec.gov/firm/summary/316414.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No, we do not have legal or disciplinary events. Visit https://www.investor.gov/ for a free, simple search tool to research us and our financial professionals.

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5: Additional Information

For additional information on our advisory services, see our Form ADV, available at https://adviserinfo.sec.gov/firm/summary/316414. If you have any questions, require additional information, or would like to receive another copy of this Client Relationship Summary, please contact us at 972-379-7896.

Questions to ask us: 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?