# **Starlight Funding Investments, LLC**

# **Customer Relationship Summary (Form CRS)**

May 20, 2024

### Introduction

Starlight Funding Investments, LLC is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member firm of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. We are a broker-dealer and provide our clients with brokerage services. This document gives you a summary of the types of services we provide and how you pay for those services. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available for you to research firms and financial professionals at <a href="https://www.investor.gov/CRS">www.investor.gov/CRS</a>, a website maintained by the SEC. These tools can also provide you with educational materials about broker-dealers, investment advisors, and investing.

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

We offer brokerage services to retail investors, which includes our making recommendations regarding the buying of unregistered securities (private placement securities) by retail investors. Those services include the determination of suitability for investment in private placement securities, making investment recommendations consistent with your investment strategy, and facilitating the execution of your private placement securities transactions. We do not provide on-going monitoring of private placement securities. Additionally, our services are provided on a non-discretionary basis, and to this end, while we may recommend investments for you, the ultimate investment decision regarding the purchase of private placement securities will be yours. We do not have any account minimum or other requirements for retail investors to open or maintain an account or establish a relationship with us; we work with retail investors with various account sizes at our discretion. Our investment advice covers a limited selection of investments. Other firms could provide advice on a wider range of choices, some of which might have lower cost. We generally require retail investors to be "accredited investors" to purchase private placements through us, although in certain circumstances, the sponsor of such private placement investments may waive that requirement. Finally, it should be noted that we also offer mergers and acquisition services to corporate and institutional clients and research products.

#### Additional Information

For additional information, please see our Regulation Best Interest Disclosure, your subscription agreement, or other applicable documents or on our website: www.starlightinvestments.com.

### Conversation Starter: - Ask your financial professional -

- Given my financial situation, should I choose a brokerage 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?

# What fees will I pay?

### **Principal Fees and Costs**

If you invest in a private placement security through us, the sponsor or fund managers will pay Starlight a transaction-based fee, generally referred to as a commission, every time you buy any such investment. While our fees vary, they are not generally negotiable, as the commissions are generally set by the issuer of the respective private placement securities. Thus, the amount you pay will depend for example, on the commission negotiated between the issuer of the private placement securities and us, and how much you invest in the private placement security.

Ultimately, the more transactions in your account, the more fees we charge you. We therefore have an incentive to encourage you to engage in transactions.

### **Other Fees and Costs**

While we do not charge additional fees, some private placement investments impose additional fees that will reduce the value of your investment over time. You should review the related offering documentation for any private placement security you acquire for additional information on fees and costs.

### **Additional Information**

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 our Regulation Best Interest Disclosures for additional information regarding our fees and costs.

Conversation Starter: Ask your financial professional and start a conversation about the impact of fees and costs on investments -

 Help me understand how these fees and costs 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 providing recommendations? How else does the firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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 recommendations and investment advice, we provide you. Here are some examples to help you understand what this means:

• We receive payments, and we may receive equity or other ownership rights, from the sponsors and issuers of private placement securities (or their affiliates) when we recommend or sell private placement securities. As such, we have an incentive to recommend that you invest in the private placement securities of third parties that pay us over products of third parties that do not pay us or pay us less. Additionally, when you invest in a private placement security, the issuer, the dealer, and other related entities could be under common ownership and management.

### **Additional Information**

For additional information, please see our Regulation Best Interest Disclosures.

Conversation Starter: Ask your financial professional -

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

### How do your financial professionals make money?

Your financial professional compensation is primarily based upon a portion of the sales commissions resulting from your purchase of private placement securities. As a result, your financial professional has a financial incentive to sell private placements to you.

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

**No.** Please see <u>www.Investor.gov/CRS</u> or <u>https://brokercheck.finra.org</u> for a free and simple tool to research the background and experience of us 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?

### Where can I find additional information?

For additional information regarding our services, please see our Regulation Best Interest Disclosures or if you would like a copy of this disclosure, please contact Alan Davis by phone at 510-527-6954, or by email at <a href="mailto:alan@starlightinvestments.com">alan@starlightinvestments.com</a>.

Conversation Starter: Ask your financial professional -

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

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June 30, 2020 May 20, 2024

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