ZENIT

Item 1 – Introduction: Is an investment advisory account right for you?

Zenit Wealth Advisors, Inc. is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ and that 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**, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – What investment services and advice can you provide me?

We offer investment advisory services to retail investors. Our principal services is portfolio management. As part of our standard portfolio management services, we provide continuous and regular supervisory and/or management services with respect to your account(s). We may use one or more sub-advisers to manage all or a portion of your portfolio. We rely on proprietary investment research along with research provided by third parties. All accounts are managed in accordance with the client's investment needs.

Our portfolio management services are offered on a discretionary, and in limited cases, non-discretionary basis. Discretionary authorization allows us to determine the specific securities, and the number of securities, to be purchased or sold for your account without your approval prior to each transaction. Non-discretionary portfolio management service means that we must obtain your approval prior to making any transactions in your account. We do not limit our advice to proprietary products, or a limited menu of products or types of investments.

In general, we require a minimum of $100,000 to establish a relationship with us. At our discretion, we reserve the right to waive this minimum.

For additional information, please refer to Items 4, 7, & 13 of our Form ADV Part 2A at the following link: https://adviserinfo.sec.gov/firm/brochure/334122

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 – What fees will I pay?

Zenit Wealth charges an annual management fee of up to 2.00% of assets under management and a performance fee of up to 20% of the capital appreciation and/or capital gains of the portfolio. The fee is negotiable and the exact fee paid by you will be stated in the advisory agreement signed by you and us. Where a sub adviser is recommended, we will either include the fees charged by the sub-adviser in our overall fee, or the client will pay separate and distinct fees directly to the sub-adviser. The sub-adviser's fee and fee payment arrangement will be clearly disclosed to the client at time of recommendation.

The annual management fee is billed monthly or quarterly, in advance or in arrears, depending on the arrangement negotiated with each client and listed in the advisory agreement. Fees will be assessed pro rata in the event the advisory agreement is executed at any time other than the first day of a billing period. Fees will be adjusted for any deposits or withdrawals in excess of $100,000 during the quarter. We may deduct the fee from a single, client-designated account to facilitate billing.

Where a performance-based fee is charged, portfolio performance will be calculated based on the capital appreciation and/or capital gains of the portfolio from January 1 to December 31 of a calendar year and will be invoiced in the beginning of the following calendar year. Fees will be adjusted for deposits and withdrawals made during the relevant 12-month period. In the event the client makes a complete withdrawal from the account on a date other than year-end, fees will be due at the time of withdrawal.

The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account.

For additional information regarding our fees, please see Item 5 and Item 6 of our Form ADV Part 2A at the following link: https://adviserinfo.sec.gov/firm/brochure/334122

Description of Other Fees and Costs: The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by sub-advisers and investment companies (i.e., mutual funds, exchange traded funds, unit investment trusts and variable annuities). These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities along with custodial fees, retirement account fees, trust fees, exchange fees, redemption fees. These charges and fees are typically imposed by the custodial broker dealer that executes the trade. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our firm, and others. **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 about fees charged by third parties, please refer to Item 5 and Item 6 of Form ADV Part 2A at the https://adviserinfo.sec.gov/firm/brochure/334122

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. We have to 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. Here is an example to help you understand what this means:

- All investment advisers face conflicts of interest which are inherent in the business. Our primary source of compensation is through asset-based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management. Comparable services for lower fees may be available from other sources.
- Performance-based fees create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement. Performance-based fees also create an incentive for our firm to overvalue investments that lack a market quotation.
- Side-by-side management provides an incentive for our firm to favor accounts for which we receive a performance-based fee. For example, we may have an incentive to allocate limited investment opportunities, such as initial public offerings, to clients who are charged performance-based fees over clients who are charged asset-based fees only.
- Other conflicts of interest result from other business activities we engage in and relationships we have with business partners, such as Jefferies LLC and Interactive Brokers, LLC, our recommended broker dealers, and other vendors.

Conversation Starter. Ask your financial professional—

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

Please refer to our Form ADV Part 2A for further information on our conflicts of interest and how we address them at the following link: https://adviserinfo.sec.gov/firm/brochure/334122

How do your financial professionals make money?

Our financial professionals receive salary-based compensation, a percentage of advisory billings and/or bonuses based on the amount of client assets they bring to our firm. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account. Additionally, financial professionals who have an ownership interest in our firm share in the profits generated by our firm.

Item 4 – Do you or your financial professionals have legal or disciplinary history?

No.

For a free, simple search tool to research us and our financial professionals please visit Investor.gov/CRS.

Conversation Starter. Ask your financial professional—

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

Item 5 – Additional Information

For additional information about our advisory services, please refer to our Form ADV Part 2A brochure available at **https://adviserinfo.sec.gov/firm/brochure/334122** and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information and/or need a copy of this Client Relationship Summary, please call us at +1 (809) 540 2000 or email us at **pamela.german@zenitcapital.com**.

Conversation Starters. Ask your financial professional—

- *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?*