

ITEM 1 - INTRODUCTION

ISTO Advisors, LLC is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. One of the requirements of being a Registered Investment Adviser (“RIA”) is to produce this Client Relationship Summary.

As an RIA, we do not sell products or accept commissions; however, certain investment adviser representatives are licensed insurance agents and may receive insurance commissions. We have a fiduciary responsibility to our clients and are legally required to act in their best interests. This differentiates us from brokerage firms, which offer other types of services, fee structures, and working relationships. Brokerage and investment advisory services and fees differ, and it is important to understand these differences, which is why the SEC provides free and simple tools for researching financial professionals at www.investor.gov/CRS. This site also provides educational materials about investment advisors and investing.

ITEM 2 – WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Comprehensive Wealth Management. ISTO Advisors, LLC offers investment advisory services to clients on a discretionary and non-discretionary basis. This service is designed to assist clients in meeting their financial goals through the use of a financial plan or consultation. Our firm will analyze each client’s current investments, investment objectives, goals, age, time horizon, financial circumstances, investment experience, investment restrictions and limitations and risk tolerance. Additionally, we will review the client’s insurance needs, tax and estate planning goals and objectives. In a discretionary account, you have granted written investment authority to your Financial Professional to execute purchase and sell orders in your advisory accounts without consulting with you first. You may limit our authority, such as by imposing reasonable restriction on investing or trading in certain securities or groups of securities. In a non-discretionary account, you have not granted written investment authority to your Financial Professional and he or she will consult with you before executing trades in your account. As the retail client, you make the ultimate decision regarding the purchase or sale of your investments. You may limit our trading authority, such as by imposing reasonable restrictions on investing or trading in certain securities or groups of securities. As an investment adviser, we provide investment advice and monitoring of your accounts through our Investment Adviser Representatives (“IARs”) for an ongoing fee. Our firm typically requires a minimum account size of \$1,000,000 for advisory accounts. The minimum annual advisory fee for Comprehensive Wealth Management is \$11,250. However, sometimes, at our sole discretion, we may accept smaller accounts based on various criteria, such as anticipated future assets, related accounts, and other individual client circumstances.

Separate Managed Account or Third-Party Money Manager (“SMA” or “TPMM”): If deemed appropriate for you, our firm will recommend utilizing a separate managed account or third-party money manager (“SMA” or “TPMM”) to aid in the implementation of investment strategies for your portfolio.

In addition to our Investment Management Services, our firm offers the following services:

Financial Planning and Consulting Services: Our firm also provides standalone financial planning and consulting services for our clients. These services may include preparing a written plan that addresses one or more specific topics and is designed to help clients manage their financial resources based on an analysis of their current financial situation, goals, and objectives.

Prosperity Consulting Services: Phase 1 includes Prosperity serving young adults early on in their financial journey who wish to actively plan their life. Through access to a financial and life coach, clients are mentored on setting and attaining their goals, advised throughout money management and decision-making processes, and educated on the financial topics applicable to making those decisions. Upon completion of Phase 1, clients may choose to transition to Phase 2 by executing a Wealth Management Agreement.

Retirement Plan Consulting Services: Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring, and reviewing their company’s participant-directed retirement plan.

Third-Party Software and Technology Tools: Through third-party software applications and technology tools we can facilitate the preparation of various estate planning documents for clients. For the avoidance of doubt, neither Advisor nor third-party software applications and technology tools render legal advice or services. Third-party software applications and technology tools offer the ability to consult with licensed attorneys in various jurisdictions at an additional charge, and subject to additional terms and conditions.

FOR MORE INFORMATION, PLEASE SEE ITEMS 4, 7, 13, AND 16 OF OUR FORM ADV 2A “BROCHURE.”

Conversation Starters:

- *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.A –WHAT FEES WILL I PAY?

Comprehensive Wealth Management. Our firm offers investment management services for an annual fee based on the amount of assets under management. Fees to be assessed will be outlined in the advisory agreement to be signed by the client. Annualized fees are calculated on a flat fee or tiered fee schedule not to exceed 2.00%. Fees will be billed quarterly in advance based on the value of the account(s) on the last day of the previous quarter. We reserve the right to charge 0.50% on 529 plans. The assets of 529 plans will not be included in the aggregate household value. Our fees are exclusive of brokerage commissions, transaction fees, exchange fees, and other related costs and expenses. Where we determine to allocate capital to exchange-traded funds (“ETFs”), our fees are exclusive of the fees and expenses of the ETFs. The structure and level of our fees will vary by client based upon the services provided and other considerations deemed relevant by us. 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. The more assets in your advisory account, the more you will pay in fees, and therefore our firm has an incentive to encourage you to increase the asset value in your account.

Financial Planning and Consulting Fees: Our firm charges on an hourly or flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. The maximum hourly fee to be charged will not exceed \$1,500. Flat fees will not exceed \$100,000.

Prosperity Consulting Fees: The Prosperity service is offered in two phases, each with a separate fee arrangement. Prosperity charges a one-time flat fee of \$2,000 for Phase 1. Upon completion of Phase 1, clients may elect to transition to Phase 2 for ongoing Comprehensive Wealth Management services. Clients who choose to do so will enter into a Wealth Management Agreement and Schedule A.

Retirement Plan Consulting Services: Our Retirement Plan Consulting services are billed on the percentage of Plan assets under management. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Fees based on a percentage of managed Plan assets will not exceed 1.00%.

Separate Managed Account or Third-Party Money Manager (“SMA” or “TPMM”): Separate Managed Account (“SMA”) or Third-Party Money Manager (“TPMM”) program fees are charged independently by mutual funds, exchange traded funds, private investment funds, and separate account managers. The billing methods of these organizations are outlined in each firm’s brochure, prospectus, or contract. You pay ongoing fees directly to TPMM’s based on the assets you have under management with respect to each TPMM.

Custodian Fees: The custodian for an investment account (generally Charles Schwab & Co. Inc.) may charge transaction costs (also known as commissions), as well as custodial, redemption, administrative, and other fees. Most of our clients only pay transaction costs and occasional administrative fees. Charles Schwab & Co. Inc. also earns fees in other ways including, but not limited to, managing money market and proprietary mutual funds, margin loan interest, securities lending, and platform fees paid by fund managers. Our firm does not share in Custodian Fees charged to your account. For all services, fees will be billed as services are rendered. The amount paid to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. 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 MORE INFORMATION, PLEASE SEE ITEM 5 OF OUR FORM ADV 2A “BROCHURE.”

Conversation Starters:

- *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?*

ITEM 3.B – WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY & 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) We earn more when your assets under management increase, which creates an incentive to encourage you to invest more. 2) We may recommend rolling over assets from a retirement account into an account we manage, even when lower-cost options are available. Our firm receives a fee as compensation for providing investment services on your account. We manage accounts for multiple clients and allocate our time based on each client’s needs.

FOR MORE INFORMATION, PLEASE SEE ITEMS 5, 10, 11 AND 14 OF OUR FORM ADV PART 2A “BROCHURE.”

Conversation Starters:

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

ITEM 3.C – HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our Financial Professionals are compensated based on our firm’s revenue from our investment advisor fees. Our Financial Professionals are compensated based on the amount of assets they service, the amount of time spent, and the complexity required to meet the client’s needs or revenue based on the recommendations provided.

Some of our Financial Professionals are insurance licensed and receive commissions, trails or other compensation from the respective insurance companies as a result of effecting insurance transactions. However, you have the right to decide whether to act on the recommendation. We recognize our duty to prioritize your interests and have established policies to avoid conflicts.

FOR MORE INFORMATION, PLEASE SEE ITEMS 5, 10, 11, AND 14 OF OUR FORM ADV PART 2A “BROCHURE” AND REFER TO YOUR FINANCIAL PROFESSIONAL’S ADV 2B BROCHURE

ITEM 4 – DISCIPLINARY HISTORY

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Visit Investor.gov/CRS for a free and simple search tool to research ISTO Advisors, LLC and our financial professionals.

FOR MORE INFORMATION, PLEASE SEE ITEM 9 OF OUR FORM ADV PART 2A “BROCHURE” OR REFER TO ITEM 11 OF OUR PART 1

Conversation Starters:

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

ITEM 5 - ADDITIONAL INFORMATION

For additional information about our investment advisory services, visit the SEC’s website at <http://adviserinfo.sec.gov>. Our firm’s IARD number is CRD #284560. You may also contact us for up-to-date information and request a copy of the relationship summary by contacting us at (847) 582-9190 or www.istoadvisors.com.

Conversation Starters:

- *Who is my primary contact person? Is he/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?*

MATERIAL CHANGES

Since our last annual amendment filed on March 26, 2026, the following material changes have been made:

- Item #2: Our firm updated the minimum account required for advisory services and added a minimum annual advisory fee.
- Item #2: Our firm added language to disclose Prosperity Consulting Services.
- Item #2: Our firm renamed Estate Planning to Third-Party Software and Technology Tools to better describe the service.
- Item #3.A.: Our firm updated the Financial and Consulting maximum fee and flat fees.
- Item #3.A.: Our firm added language to disclose ISTO Prosperity Consulting Service Fees.