

Item 1 – Introduction

NewSquare Capital, LLC (“NewSquare”, “we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a Registered Investment Adviser (“RIA”). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, 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). The site 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 provide investment advisory services, including discretionary investment management services to individuals, trusts, and estates (our “retail investors”). Our investment management services are generally rendered on a wrap fee basis. When a retail investor engages us to provide investment management services we shall monitor, on an ongoing basis, the investments in the accounts over which we have investment authority. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our discretionary authority over your account(s) shall continue until our engagement is terminated. Our investment management services are typically rendered through a co-advisory relationship with MML Investor Services (“MMLIS”). In co-advisory engagements, MMLIS is generally responsible for the initial and ongoing day-to-day relationship with the client, including the initial and ongoing determination of client suitability for our asset allocation strategies. In such co-advisory engagements, we are responsible for managing the client’s assets consistent with one or more of our asset allocation strategy(ies), as communicated to us by MMLIS. In rare instances, we may also be directly engaged to provide investment management services.

We do not limit the scope of our investment advisory services to proprietary products or a limited group or type of investment. We do not generally impose a minimum asset level or minimum annual fee for investment advisory services.

Additional Information: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively in our [ADV Part 2A](#).

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?

We provide our investment management services on a fee basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our “AUM Fee”). The total annual fee to be paid by the client will be determined by that client’s financial professional, but shall not exceed 1.75%. Our portion of the annual fee shall generally range from 0.15% to 0.65% of client assets, depending on the investment strategy selected. We typically deduct our AUM Fee from one or more of your investment accounts on a quarterly basis, either in arrears or advance. Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage. In addition, because we manage assets on a wrap fee basis, our AUM Fee will include most transaction costs and fees to a broker-dealer or bank that has custody of your assets, and therefore may be higher than a typical asset-based advisory fee.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. For accounts managed outside of our wrap fee program, custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). Any such applicable charges will be assessed in accordance with the qualified custodian’s transaction fee/brokerage commission fee schedule. Relative to mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund expenses). 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.

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?

Additional Information: For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [ADV Part 2A](#).

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:

- * Because we pay transaction fees and/or commissions for clients who engage us under our wrap fee program, we have an economic incentive to maximize our compensation by seeking to minimize the number of trades in the client's account.
- * Certain of our representatives, in their separate capacities, are registered representatives of a broker-dealer and/or licensed insurance agents and may recommend commission-based securities and insurance products.
- * We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.

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

Additional Information: For more detailed information about our conflicts of interest, please review our [ADV Part 2A](#).

How do your financial professionals make money?

The majority of our financial professionals are compensated on the basis of a percentage of investment advisory fees collected by NewSquare. The total annual fee shall not exceed 1.75%. Of this all-inclusive wrap fee, the fee is broken down into three sections, the NewSquare Management Fee, the MMLIS IAR Advisory Fee and the MMLIS Administrative Fee. This is also described in Item 5 of our [ADV Part 2A](#). NewSquare receives our portion of the management fee (range from 0.15 to 0.65 of client assets based upon the model selected), the MMLIS Administrative Fee, a Tiered Fee of 0.05% on assets at \$1,000,000 or under and 0.02% on assets above \$1,000,000 and the IAR receives the remaining portion of the advisory fee. This compensation arrangement presents a conflict of interest, as our financial professionals are incentivized to make recommendations on the basis of increasing advisory fee revenue, rather than basing such recommendations on a particular client's need. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No.

We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional:

As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Matthew Wilson, at any time to request a current copy of your [ADV Part 2A](#) or our *relationship summary*. Our Chief Compliance Officer may be reached by phone: 610-325-6117.

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