



## MANZIL INVESTMENT ADVISORS, LLC FORM ADV, PART 3 (CRS)

### INTRODUCTION

Manzil Invest Investment Advisors, LLC (“Manzil Invest,” the “Adviser,” the “Firm,” the “Company,” “we,” “us” or “our”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, 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://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

*What is the difference between a Broker and an Adviser (like Manzil Invest), and how do fees differ?*

An **investment adviser** is generally any entity that provides investment advice or conducts securities analysis in exchange for a fee, typically based on the portfolio’s total value. In contrast, a **broker-dealer** is a firm that acts as an intermediary between buyers and sellers of securities for which they will usually receive a commission, which is paid per transaction.

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

Manzil Investment Advisors LLC (“Manzil Invest”), a Delaware limited liability company, is an investment adviser that is registered with the U.S. Securities and Exchange Commission (the “SEC”) pursuant to the Investment Advisers Act of 1940, as amended (the “Advisers Act”). The Company has been registered with the SEC since May 14, 2020. The Company’s principal office is based in Dallas, Texas. It has an additional office location (parent company) in Toronto, Canada.

- The Company is classified as a registered investment adviser under the SEC Rule 203A-2(e) (“Exemption from Prohibition on Commission Registration”) of the Advisers Act (otherwise known as a “robo-advisor”), which creates an eligibility to operate as a registered investment adviser, provided the elements of that rule are met. Toward this end, **the Company’s investment management services are offered online only** to individual separate accounts (each a “Client” and collectively, “Clients”). The types of Clients to which Manzil Invest provides investment management services are more fully disclosed in Form ADV Part 1 and summarized in *Item 7 – Types of Clients* of this Brochure.
- Manzil Invest is a Shariah-compliance advisory firm. When Manzil Invest serves as investment adviser, it enters into a written investment management agreement with each of its advisory Clients. Investment management agreements include provisions related to each Client’s management fees, investment strategy, investment guidelines, termination rights, proxy voting and sub-adviser, if applicable. In summary, Manzil Invest provides the following advisory services:
- Discretionary Investment Management, except as otherwise set forth in any applicable Client Agreement. Our clients authorize Manzil Invest to investigate, purchase, and sell on behalf of Client, various securities and investments. Manzil Invest is authorized to execute purchases and sales of securities on Client’s behalf without consulting Client regarding each sale or purchase. Clients may, however, terminate the discretionary authority of Manzil Invest immediately upon written notice.
- Non-Discretionary Investment Management. In these types of Client Agreements, Manzil Invest is authorized to execute purchases and sales of securities only after securing permission from Client regarding each transaction.

**For additional information, please see Items 4, 7, 8, and 13 of our Form ADV Part 2A brochure here:**  
<https://adviserinfo.sec.gov/firm/summary/308500>

*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?”*

#### What fees will I pay?

Manzil Invest’s fees are fixed. The fixed fee will be a subscription fee of \$2 per month, plus 0.49% per year. Fees are paid in arrears. Clients may terminate the agreement without penalty, for full refund of Manzil Invest’s fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice. Manzil Invest typically collects its fees in arrears. However, in very limited instances with clients, as outlined in the agreement, Manzil Invest collects its fees in advance and quarterly. Asset-based portfolio management fees are withdrawn directly from the Client’s accounts with Client’s written authorization on a quarterly basis. Manzil Invest typically collects its fees in arrears. Clients enrolled in our wrap fee program will only pay Manzil Invest a wrap fee that covers both Manzil Invest’s investment advisory services and the related unaffiliated brokerage services.

**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, please see Item 5 of our Form ADV Part 2A brochure here:**

<https://adviserinfo.sec.gov/firm/summary/308500>

*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. Here are some examples to help you understand what this means.

The Company and its personnel serve as the portfolio managers for all wrap fee program accounts. This is a conflict of interest in that no outside adviser assesses Manzil Invest’s management of the wrap fee program. However, Manzil Invest addresses this conflict by acting in its clients’ best interest consistent with its fiduciary duty as sponsor and portfolio manager of the wrap fee program.

Murabaha Inc. (d/b/a Manzil) (“Murabaha”), a Canada based entity, acquired the Firm through Manzil Inc. (“Manzil”), a Delaware based entity and a wholly owned subsidiary of Murabaha as of November 2024. Manzil, Inc. retains direct ownership and Murabaha retains indirect ownership of the Firm. The Firm operates as a U.S. based subsidiary of Manzil, a Canadian Islamic fintech startup. Manzil is a Canadian Islamic fintech startup based in Toronto, Canada. Manzil offers Shariah-compliant financial products. Murabaha Inc., operating as Manzil in Canada, is an active corporation registered under the Canada Business Corporations Act (CBCA) since March 1, 2019. Manzil provides Shariah-compliant financial products and services, such as home financing and investments. More details can be retrieved from <https://ised-isde.canada.ca/cc/lgcy/fdrlCrpSrch.html>. Manzil’s subsidiary Manzil Mortgage Services Inc. is regulated as a mortgage broker in the province of Ontario under the Financial Services Regulatory Authority of Ontario (FSRA). Unless prohibited by applicable law, a Firm is permitted to use its affiliates’ qualified personnel and facilities to perform services related to the exercise of its fiduciary powers. Service arrangements between the Firm and its affiliates for these delegated activities are documented under written agreements and subject to effective ongoing oversight in accordance with applicable regulatory guidance on service provider oversight. Standards of Conduct: Manzil and its access persons are expected to comply with all applicable federal and state laws and regulations. Access persons are expected to deal with Clients fairly and disclose any activity that may create an actual or potential conflict of interest between them and Manzil or Client.

*Conversation Starter. Ask your financial professional:*

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

**For additional information, please see Items 4, 5, 6, 10, and 11 of our Form ADV Part 2A brochure here:**

<https://adviserinfo.sec.gov/firm/summary/308500>

**How do your financial professionals make money?**

Neither Manzil Invest, nor any representatives of Manzil Invest receive any additional compensation beyond advisory fees for the participation of client’s in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, Manzil Invest may have a financial incentive to recommend the wrap fee program to clients.

**For additional information, please see Item 14 of our Form ADV Part 2A brochure here:**

<https://adviserinfo.sec.gov/firm/summary/308500>.

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

No. You can go to [Investor.gov/CRS](https://investor.gov/CRS) and use the free and simple search tool to research our firm 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?”*

**For additional information, please see Item 9 of our Form ADV Part 2A brochure here**

<https://adviserinfo.sec.gov/firm/summary/308500>

**Additional Information**

**For additional information about our services,** see our Disclosure Brochure (Form ADV Part 2A) and Customer Relationship Summary (Form CRS) brochure at <https://adviserinfo.sec.gov/firm/summary/308500>, as well as the Brochure Supplement (Form ADV Part 2B) and Investment Advisory Agreement your financial professional provides. You can reach us by phone at (425) 202-6196 to request up-to-date information and a copy of this relationship summary.

*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?” “Who can I talk to if I have concerns about how this person is treating me?”*