

# Form ADV Part 3: Form CRS—Client Relationship Summary

We ("Private Wealth Asset Management", "PW", "the Firm") are registered with the SEC as an investment advisor. Brokerage and investment advisory services 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 <a href="http://investor.gov/crs">http://investor.gov/crs</a>, which also provides educational materials about broker-dealers, investment advisors and investing.

#### **RELATIONSHIPS AND SERVICES**

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

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A ("Disclosure Brochure"). Our services include investment advisory services. As part of our standard services, we monitor investments that we manage on a continuous and ongoing basis. There are no material limitations to our monitoring. We accept discretionary authority to implement the recommended transactions in Client Accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. We do not offer proprietary products. We offer advice on mutual funds, exchange-traded funds ("ETFs") and independent third-party investment managers. Your Account may also have individual debt and equity securities and options. Where appropriate, we provide advice about any type of legacy position or other investment held in your portfolio; however, you should not assume that these assets are being continuously monitored or otherwise advised on by us unless specifically agreed upon. Our services are not subject to a minimum fee or Account size.

Additional information about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and are available to all Clients, or by going here and searching by the firm's name: https://adviserinfo.sec.gov/

**Let's discuss…** 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?

# FEES, COSTS AND STANDARDS OF CONDUCT

#### What fees will I pay?

The fees for these types of services are negotiated between the Client and the firm. You have the option to select a simple asset management fee and the optional Investment Management Strategy Program fee, both of which are calculated on the basis of total value of assets under management. Investment management fees are billed monthly, in arrears, meaning that we charge fees to you after the monthly billing period has ended. Fees are calculated on the basis of the daily average balance, which is determined by averaging your Account's day-end values for the days of the month your Account is active. Payment in full is expected upon charging of fees. Fees may be deducted from a designated Client Account to facilitate billing.

The Client must consent to advance to direct debiting of their investment Account. Clients may also choose to pay by check.

In addition to the advisory fees paid to us, you also incur certain charges imposed by other third parties, such as broker-dealers, third-party money managers, and custodians. These charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by independent managers, margin costs, charges imposed directly by a mutual fund or ETF in a Client's Account as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage Accounts and securities transactions.

The more assets there are in your advisory Accounts, the more you will pay in fees, so the firm will have an incentive to encourage you to increase the assets in your Account or manage them in a way where we receive higher fees. 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.

Additional information about our fees can be found in Item 5 of our Disclosure Brochure and is available to all Clients, or by going here and searching by the firm's name: https://adviserinfo.sec.gov/

**Let's discuss···** 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 advisor? How else does your firm make money and what conflicts of interest do you have?

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, we are obligated 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. The following is an example to help you understand what this means:

Third-Party Payments: While we do not receive compensation from third parties when we recommend
investments, our supervised persons or affiliates may recommend insurance products in their individual
capacities. This results in an incentive for our supervised persons or affiliates to recommend those
insurance products.

Let's discuss... How might your conflicts of interest affect me, and how will you address them?

Additional information about our conflicts of interest can be found throughout our Disclosure Brochure and is available to all Clients, or by going here and searching by the firm's name: https://adviserinfo.sec.gov/

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

We approach your investment with a team-oriented approach. Our professionals are paid a base salary with the option to get dividends of profits of the business as owners.

We are not compensated in any other ways. There is no additional compensation based on time and complexity, the product sold, amount of Client assets serviced, percentage of assets overseen or commissions.

Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.

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

Yes. You can visit <a href="http://investor.gov/crs">http://investor.gov/crs</a> for a free and simple search tool to research us and our financial professionals.

#### ADDITIONAL INFORMATION

To obtain additional information regarding our services or to request a copy of this relationship summary, please contact us at (888) 611-PWAM.

Let's discuss... Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me? Our firm and its representatives have a fiduciary duty to all Clients. Please call us at (888) 611-PWAM if you have any concerns.

Let's discuss... As a financial professional, do you have any disciplinary history? For what type of conduct?

You can find additional information about our services on our website at www.pwam.com and in our Disclosure Brochure. To request a copy of this relationship summary and any of our other disclosure documents referred to in this document, please call us at (888) 611-PWAM.

# ADDENDUM 1: CHANGES TO FORM CRS

Date of Change: 10/31/21

Information updated: The basis for fees charged is changed from total Account value as of day's end on the

final day of the month to daily average value as of day's end on the final day of the month.

Date of Change: 11/30/21

Information updated: Form CRS now references the Investment Management Strategy Program.

Date of Change: 3/16/22

Information updated: PW formerly offered a separate fee program involving a negotiated flat fee. This

program was never used and has been terminated.