

Roanoke Asset Management Corp. Client Relationship Summary (CRS) June 19, 2020

Item 1: Roanoke Asset Management Corp. (“Roanoke” or “us,” “our,” “we,” or the “Firm”) is an investment adviser registered with the Securities and Exchange Commission (“SEC”). We remind retail investors that investment advisory and brokerage services and fees differ and that it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice do you provide me?

We offer investment advisory accounts and services for which we exercise discretion. This allows us to buy and sell investments for you without seeking your permission in advance. In the context of designing portfolios that fit a client’s risk tolerance and investment objectives, we help investors develop an appropriate long-term investment strategy. We invest in marketable securities, ETFs, mutual funds and, for accredited investors, Roanoke Partners, L.P., an affiliated private fund. As part of our standard services, we monitor accounts daily and we communicate with our clients about their portfolios often and at least quarterly. Roanoke has been providing investment advisory services to clients like you for more than 40 years. There is no minimum required to open an account with us. For more detailed information about our services, investment process, the clients we serve and our qualifications, please review our [Form ADV Part 2A. Items 4, 7, and 8.](#) and Form [ADV Part 2B](#)

We also suggest that retail investors ask any prospective investment advisor the following questions:

“What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”

“Given my financial situation, should I choose an investment advisory service? Why or why not?”

“How will you choose investments to recommend to me?”

Please email slb@roanokeasset.com for answers to these and any other questions.

Item 3: Fees, Costs, Conflicts and Standard of Conduct:

What fees will I pay?

Roanoke charges asset-based fees; our affiliated private fund, Roanoke Partners L.P., also charges a performance-based fee. More information about our fees, including a schedule of our asset-based fees, can be found in our Form [ADV Part 2 Item 5](#). Asset-based fees are charged quarterly in advance based on the assets under management on the last day of the quarter immediately preceding the date of the bill. Retail investors should be aware that certain conflicts of interest may arise in connection with Roanoke’s management of Roanoke Partners, L.P., which is compensated with performance-based fees. Also, the more assets you have in your advisory account the more you will pay us, so we may therefore have an incentive to encourage you to increase the assets in your account in order to increase our fees. A retail investor can expect to pay certain other fees and costs in addition to Roanoke’s asset-based fee. For example, mutual funds impose their own fees and you will pay transaction-based fees for brokerage services provided by third-party brokers in addition to the Firm’s fee. Also, investors will pay the costs of custody to banks and broker-dealers that hold the investor’s assets. 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.

We suggest that retail investors ask any prospective investment advisor the following question to clarify the impact of fees and costs on investments:

“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?”

Please Email slb@roanokeasset.com for a detailed answer to this and any other questions you may have .

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?

We must abide by certain laws in our interactions with you, including the Investment Advisers Act of 1940 and the SEC's regulations thereunder. We have a written compliance manual and code of ethics which is described in our [Form ADV Part 2 Item 11](#). 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:

Roanoke only makes money by charging its clients an asset-based fee except in the case of Roanoke Partners, L.P. a private investment fund which charges a performance-based fee. The Firm's principals are also the principals of Roanoke Partners, L.P. We may have an incentive to offer clients of the Firm an investment in Roanoke Partners, L.P. because it pays a performance-based fee. We also may have an incentive to favor clients of Roanoke Partners, L.P. because the compensation we receive from those clients is more directly tied to the performance of their accounts. We could own a security that you own, and have a conflict between our ownership and yours, or we could be financially incentivized to favor one client over another. When our interests conflict with your interests, we must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them.

We suggest that retail investors ask any prospective investment advisor the following question:

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

Please email slb@roanokeasset.com for a detailed answer to this and any other questions you may have.

For additional information about our conflicts of interest see [Form ADV, Part 2A](#)

How do your financial professionals make money?

We are owned by our investment professionals. Their compensation consists of salary and bonus based on the profitability of the Firm, which in turn is directly linked to the Firm's assets under management.

Item 4. Disciplinary History

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

No, we do not.

Visit www.investor.gov/crs for a free and simple search tool to research our firm and our financial professionals.

We suggest that retail investors ask any prospective manager the following question

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

Please Email asw@roanokeasset.com for a detailed answer to this and any other questions you may have

Item 5. Additional Information

You can find additional information about our investment advisory services and request a copy of this relationship summary by contacting us at slb@roanokeasset.com or phoning 201 985 1111 ext. 13.

We suggest that retail investors ask any prospective investment adviser the following questions:

"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?"

Please email slb@roanokeasset.com for a detailed answer to this and any other questions you may have.

Additional information about our investment advisory services can be found in our [Form ADV Part 2](#). You can obtain a copy of this relationship summary and Form [ADV Part 2](#) at www.roanokeasset.com.