O'Higgins Asset Management, Inc. Form CRS Customer Relationship Summary March 31, 2024

Introduction

O'Higgins Asset Management, Inc. is registered with the Securities and Exchange Commission as an investment advisor, and we provide investment advisory services rather than brokerage services. Investment advisory services and brokerage services and fees differ, and it is important for the retail investor to understand the differences. This document gives you a summary of the types of services that we provide and how you pay.

Please ask us for more information. 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 advisors, and investing.

Relationships and Services

What investment services and advice can you provide me?

Services: We provide fee-based, separate account investment advisory services directly to individuals, high net worth individuals, trusts, corporations and charitable organizations. We also provide investment planning services to those clients who request additional help with their financial needs. Our firm engages in no business activities other than fee-based investment advisory.

Monitoring: O'Higgins Asset Management, Inc. principally manages portfolios on a fully discretionary basis using a variety of disciplined, value-based, asset allocation and security selection models. The firm's portfolios are normally concentrated in fewer than twenty securities. As a rule, securities are of the liquid, blue chip variety and are typically held for at least one year. No consideration is given to the tax implications of investment decisions. The firm's policy is to maximize risk-adjusted returns in the belief that this produces the best after-tax returns. All growth oriented accounts are invested in a similar manner and are not tailored to individual client needs. Fixed income accounts are handled on a fully discretionary basis, however duration and investment quality/rating for the individual accounts are predetermined either through a client's preexisting investment policy or guidelines established when the account is opened. The firm does have non-discretionary clients but this service is currently not offered.

Investment Authority: Discretionary authority is typically granted by the Investment Management Agreement and/or trading authorization forms that you sign with our firm. We buy and sell investments in your account in accordance with the stated investment guidelines of the selected investment discipline without asking you in advance. This is called "discretionary authority".

Investment Offerings: Our investment advice is not limited to a particular type of security. We provide advice with respect to equities, fixed income, and cash investments.

Account Minimums: Our stated minimum client relationship size is \$1,000,000. This is negotiable at our discretion.

Additional Information: On April 1, 1978, Mr. O'Higgins founded his own money management firm where he has continued to provide investment management services. O'Higgins Asset Management, Inc. is a registered investment adviser incorporated in Florida. The principal owners of the firm are Michael B. O'Higgins, President and Donna B. O'Higgins.

Ask us for our Form ADV Part 2A Brochure for complete details about our services and fees.

Conversation Starter – 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?

Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Principal Fees and Costs: You will pay an on-going, mutually-agreed asset-based fee at the beginning of each quarter for our services (as agreed in your contract), based on the value of the cash and investments in your advisory account. The more assets there are in your account, the more you will pay in fees, and the firm may therefore have an incentive to encourage you to increase the assets in your account. Our standard fee is 1% of assets per year. Incentive based fees are also available, however this option is only high net worth individuals on a negotiated basis.

Other Fees and Costs: You are responsible for all custodial and securities broker-dealer execution fees charged by the custodian and executing broker-dealer. Our asset-based fee is separate and distinct from the custodian and broker-dealer execution fees. Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time. These fees are separate and distinct from our fees.

Additional Information: 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.

Refer to our Form ADV Part 2A Brochure, Item 5.A.B.C.D. for more detailed information about our fees.

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 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 adviser and what conflicts of interest exist?

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.

Potential Conflicts: The more assets there are in your advisory account, the more you will pay in fees, and the firm may therefore have an incentive to encourage you to increase the assets in your account. We also personally own the same securities that you own however we have policies in place to never front run a purchase of a security or sell a security for our personal benefit at a high price.

Conversation Starter – Ask your financial professional:

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

How do your financial professionals make money?

Our financial professionals are compensated through a combination of salary and bonus. Salary is tied to the amount of client assets that the professional manages and services. Bonuses are discretionary, and reflect the overall success of the firm and the individual. Our financial professionals receive no product sales commissions or other forms of payment.

Disciplinary History

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

Yes, our firm and/or financial professionals have legal and disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals. www.Investor.gov/CRS to research our firm and financial professionals.

Conversation Starter - Ask your financial professional:

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

Additional Information

For additional information about our services, or for a copy of this disclosure, please contact:

Michael B. O'Higgins, President Phone: 305-861-1883

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?