

## 1. Garner Asset Management Corporation Relationship Summary, June 20, 2020

Garner Asset Management Corporation (GAMC) is an investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ. It is important for the retail investor 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), which also provides educational materials about broker-dealers, investment advisers, and investing.

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

GAMC provides investment advisory services to retail investors. Our service consists primarily of creating and managing an investment portfolio based on your goals and tolerance for risk. After initial consultations with you to determine those goals and tolerances, we buy securities for you through a broker/dealer who holds your assets. We do not hold any client assets. We are not a broker/dealer. Our only revenue comes from portfolio management fees. Most of our clients use Charles Schwab & Co. for the purpose of trading and holding their assets. For the vast majority of our clients, we have discretionary authority to place trades directly with Schwab (or another broker/dealer) on your behalf, but for a small number of accounts we do not have this authority. In these instances, the investor makes the ultimate purchase and sale decisions. We monitor your portfolio investments on a continuing basis. We continue to communicate with you to ensure we continue to understand your goals and risk tolerance as they evolve over time. We do not advise investors on private or limited offerings. There is a minimum account size of \$50,000 and a minimum annual fee of \$550. All fee arrangements, including minimums, are negotiable (see below).

For additional information about GAMC, please see our most recent Form ADV, a disclosure document filed with the SEC that contains greater detail about GAMC. Our ADV is available directly from GAMC or from the SEC at [investor.gov](https://www.investor.gov) or [adviserinfo.sec.gov](https://www.adviserinfo.sec.gov).

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?

## 3. What fees will I pay?

Our fees are almost always based on the amount of assets we manage for you. The fees are computed and billed in advance near the beginning of each quarter. Our standard annual fee schedule is 1.1% on accounts up to \$500,000 of assets, 1.0% on accounts up to \$1,000,000, 0.9% on accounts up to \$1,500,000, and an individually negotiated amount on any accounts in excess of \$1,500,000. Fees for the initial quarter and any subsequent additions or withdrawals are pro-rated. If you cease to be a client mid-quarter, any unearned fees are refunded. In rare cases, we bill work we do on an hourly basis at the rate of \$200/hour. Whether asset based or hourly there is an annual minimum fee of \$550. All fees are negotiable. You will also typically pay transaction and other fees (e.g. wire transfer fees) to Schwab or another broker/dealer. For our clients at Schwab, we reduce our fees by the amount of transaction fees the quarter after they are incurred. For some clients we invest only in mutual funds, which have embedded in them a separate management fee. For those clients, we charge a lower portfolio management fee of 0.40% annually. Because our fees are primarily asset based, we may have an incentive to encourage you to increase assets in your account.

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. More detailed information about our fees is available in our Form ADV, specifically the Fees and Compensation section of ADV part 2A on pages 1-3. The ADV is available either directly from GAMC or from the SEC at [investor.gov](http://investor.gov) or [adviserinfo.sec.gov](http://adviserinfo.sec.gov).

Conversation starter - 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?

**4. 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.*

We benefit from greater assets under our management, but you do not benefit from this except in limited circumstances. If our assets under management go up because a new client has hired us, you do not benefit from that increase. If we suggest you hire us to manage additional assets, we believe that will benefit you, but it will also mean greater fees for us. If our assets under management go up because your portfolio has increased in value, your interest and ours are aligned. We have a single source of revenue (portfolio management fees from clients like you) and thus we do not have conflicts based on secondary sources of revenue. For example, we do not benefit based on what securities we buy or sell for you, how often you trade, where your assets are kept, who does your taxes, etc.. We urge you to consider the conflicts you will potentially encounter with any adviser you might hire and we are happy to discuss our own potential conflicts with you.

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

GAMC has two employees, of which only Robert Garner manages client portfolios. Robert Garner is solely compensated through the profitability of GAMC. If your account rises in value that positively affects the profitability of GAMC, but other factors that do not benefit you can also positively affect the profitability of GAMC. He may have an incentive to focus on those things.

**6. Do your professionals have legal or disciplinary history?**

No. The SEC's website [investor.gov/CRS](http://investor.gov/CRS) provides a free tool to research both GAMC and our professionals.

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

**7. Additional information**

Additional information about our relationship, including this form CRS and the rest of our ADV and any updates to those SEC disclosure forms, are available directly from GAMC or from the SEC at [investor.gov/CRS](http://investor.gov/CRS) or [adviserinfo.sec.gov](http://adviserinfo.sec.gov). Our Principal, Robert Garner is reachable at 214-387-6095 or [robert@garnerassetmgt.com](mailto:robert@garnerassetmgt.com).

Conversation starter – 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?