

Form ADV, Part 3 (“Form CRS”) Customer Relationship Summary

Introduction

Odlum Brown USA Investment Management Limited (“Odlum Brown USA”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment adviser, and investing.

What investment services and advice can Odlum Brown USA offer me?

We provide full time discretionary account management and provide you with assistance with developing your investment strategy. Discretionary account management allows us to buy and sell investments in your account solely at our discretion without your prior approval. Your account and its performance are constantly monitored by us.

All clients receive electronic monthly statements on their accounts as well as transaction confirmations available electronically the day of the transaction. If there is no account activity, electronic statements are provided on a quarterly basis. Statements and confirmations are provided in electronic format to clients.

Odlum Brown Limited, Odlum Brown USA’s parent, acts as the authorized custodian for advisory accounts of Odlum Brown USA. For additional information, please see *Form ADV, Part 2A brochure* and/or *Important Information Disclosure*.

Ask your Odlum Brown USA Representative:

- 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?
- Who is my primary contact person? Is he or she a representative of an investment-adviser or a broker-dealer?

What fees will I pay?

You will pay an on-going asset-based fee monthly. Advisory fees are payable monthly and are calculated on the month end value of a client’s portfolio. The amount paid to our firm and our representative generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted from your account. The more assets there are in your account, the more fees you will pay, and we may therefore have an incentive to encourage you to increase the assets in your account.

Payment of advisory fees, administration fees and service charges may result in the liquidation of securities if sufficient cash in the account is not available.

For a comprehensive list of the administration fees and service charges applied to all client accounts please refer to *Form ADV, Part 2A brochure – Fees and Compensation*, found on the OBUSA website.

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. For additional information, please see *Form ADV, Part 2A brochure* and/or *Important Information Disclosure*.

Ask your Odlum Brown USA Representative:

- 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 Odlum Brown USA make money and what conflicts of interest do you have?

When we act as your investment adviser, we are required 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 affect the recommendations we provide you. An example of that is: The more assets there are in your account, the more fees you will pay, and we therefore have an incentive to encourage you to increase the assets in your account. We employ three basic mechanisms to manage conflicts: we control the conflict, disclose it, or when the conflict has a serious potential impact on our clients, we avoid it. For additional information, please see *Form ADV, Part 2A brochure – Code of Ethics*.

Ask your Odlum Brown USA Representative:

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

How do Odlum Brown USA Financial Professionals make money?

Representatives are commissioned and receive a portion of the asset-based fees charged you by Odlum Brown USA. The more assets in your account, the more commission a representative will make and therefore he/she has an incentive to encourage asset growth.

Do Odlum Brown USA financial representatives have any legal or disciplinary history?

No! Visit [investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Ask your financial professional:

- As a financial professional, do you have any disciplinary history? For what type of conduct?
- Who can I talk to if I have concerns about how my Odlum Brown USA representative is treating me?

Additional Information:

For additional information about our services, please see *Form ADV, Part 2A brochure – Types of Advisory Service*. If you would like additional, up-to-date information or a copy of this disclosure, please call (866) 636-8222.

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