

Form CRS (Customer Relationship Summary) – Circle Wealth Management, LLC

Introduction

Circle Wealth Management, LLC (“we” or “us”) is registered with the US Securities and Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differ from that of a registered broker-dealer. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers, and investing. The italicized sentences in text boxes below are intended to be conversation starters for you to have with us, as required by the instructions to Form CRS.

What investment services and advice can you provide me?

Our client base is comprised of high-net-worth individuals and families, and their associated entities, including trusts, estates, charitable organizations, family partnerships, foundations, and endowments. We can assist you in all aspects of your financial life and provide a broad range of customized services including wealth advisory, financial planning, and investment management. As part of our holistic approach, we may also develop working relationships with your existing planning advisors, legal counsel, trustees, and/or personal staff, and we ensure our strategy integrates estate, tax, and insurance planning, multigenerational education, and philanthropy.

We manage client portfolios based on your unique financial situation and investment philosophy. We may manage your portfolio on a discretionary basis, with the authority to buy and sell investments in your account(s) without speaking with you prior to doing so, or on a non-discretionary basis. In either case, we develop an Investment Policy Statement that serves as a roadmap for your investment goals and outlines how the portfolio will be invested to meet your objectives.

Conversation Starters:

- *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?*

For more detailed information about our advisory business and the types of clients we generally service, please see Items 4 and 7, respectively in our [Form ADV Part 2A](#).

What fees will I pay?

We are compensated exclusively by our clients, and do not accept commissions from any third parties for providing services to you. Fees may vary based on asset size and clients’ particular needs. For wealth advisory services, our fees are based upon a percentage of the market value of the assets placed under our management, ranging from 0.24% to 0.85%.

Because our fee is based on the amount of your assets under our management, the more assets you entrust us to manage, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you designate for our management.

If a client engagement requires significant involvement in areas other than investment management, the fee may be in the form of a flat fee to reflect these additional services. Flat fees are reviewed annually and will typically not exceed 1.50% of the assets under management for that client. We also charge a flat fee for non-discretionary consulting services and, at times, for financial planning. Our negotiable fees are prorated as applicable, invoiced and paid quarterly, based either upon the market value of the assets on the last business day of the previous quarter or the annual flat fee. Although we typically require \$50 million in investment assets, the determining factor in establishing a relationship with us is the client’s fit with our practice.

Your account will be held with a qualified custodian of your choice. Custodians may charge transaction fees for effecting certain securities transactions. 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.

Conversation Starters: Help me understand how these fees and costs might affect my investments. If I give you \$30,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?

For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [Form ADV Part 2A](#).

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 is an example to help you understand what this means:

*We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we don't currently manage your account held with your employer's plan, this will increase our compensation.

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

For more detailed information about our conflicts of interest, please review Items 4, 10, 11, 12 and 14 of [Form ADV Part 2A](#).

How do your financial professionals make money?

Our financial professionals are generally compensated on a salary basis and are eligible to receive discretionary bonuses based on individual and firm performance. Some of our financial professionals are direct or indirect equity owners of the firm, who stand to receive a share of the firm's profits.

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

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals.

Conversation Starters: As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at (908) 206-1306 at any time to request a current copy of our [Form ADV Part 2A](#) or our Customer Relationship Summary.

Conversation Starters: Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?