Item 1: Introduction

Atlas Private Wealth Management, LLC ("Atlas," "we" or the "Firm") is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences between them.

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 advisers, and investing.

<u>Item 2</u>: What investment services and advice can you provide me?

Conversation Starters. Ask your financial professional "Given my financial situation, should I choose an investment

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?" We offer investment advisory services to retail investors. To our clients who are individuals, we offer wealth management and investment management services and retirement planning services, and financial counseling services to employees of independent schools. We offer investment management services primarily with respect to mutual fund portfolios, which generally invest in mutual funds and exchange-traded funds ("ETFs") (or other investments such as equity or debt securities when appropriate), and individually managed accounts, which generally invest in a broader range of securities. Previously, Atlas offered a mutual fund asset allocation service, Investment RE-Allocation Service ("REAL"), for smaller, tax-deferred accounts (e.g., IRAs and 403(b)s) and accounts holding annuities. Atlas no longer offers this service option to new accounts, but continues to manage legacy accounts that were established prior to discontinuation of Atlas' offering the REAL service. We require new clients to have a minimum of \$250,000 to invest with us, though retain the discretion to waive the minimum under appropriate circumstances.

If you utilize our investment management services, you will typically give us discretionary authority to trade the assets in your account through a limited power of attorney contained in your client agreement with us. We will monitor the holdings and performance of the investments we make for you on an ongoing basis and will provide you with periodic reports about the performance and holdings of your account. When we provide school counseling services on a standalone basis, we do not take discretion over your investments or monitor the holdings and performance of your investments on an ongoing basis.

For additional information, please refer to our <u>ADV Part 2A brochure</u> ("Brochure"), especially <u>Item 4</u> (services), <u>Item 7</u> (types of clients) and <u>Item 13</u> (account monitoring) and <u>Item 16</u> (discretionary authority).

Item 3: What fees will I pay?

<u>Conversation Starters. Ask</u> 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?"

For our investment management services, we charge an investment advisory fee which is based on a percentage of the value of the assets in your managed portfolio account. The more assets there are in your account and the higher the value of those assets, the more you will pay in fees. For standalone school counseling services, we typically charge a flat fee. In addition to our fees, clients are responsible for fees and expenses associated with the investment of their assets, such as brokerage commissions, transaction fees and expenses, and other expenses and charges imposed by broker-dealers and custodians who service client accounts (including but not limited to any custodian fees and account maintenance fees). Clients are additionally responsible for the fees and expenses of externally advised investments, such as mutual funds, exchange traded funds and any external managers of separately managed accounts. Our fees are listed in our client agreements. Fees and expenses clients are responsible for are described in greater detail under Item 5 of our Form ADV.

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.

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:

<u>Conversation Starters. Ask your financial professional</u>

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

We receive certain benefits from the custodians we recommend to hold your account assets, some of which help us to manage and administer client accounts, and others of which help us to manage and develop our business enterprise. The products and services provided by the custodians we recommend are a benefit to us, because we do not have to pay for them. Atlas' receipt of these products and services from the Custodians creates a conflict of interest as these benefits may influence Atlas' decision to recommend them over other service providers that do not furnish similar benefits.

We help our clients obtain financial planning and/or tax services by introducing clients to our affiliate, Connectus Wealth, LLC ("Connectus") d/b/a Connectus Financial Counseling and Connectus Accountants, respectively. Connectus, like Atlas, is a wholly owned subsidiary of Connectus Group, LLC. Connectus is compensated by our clients at an agreed upon rate. Atlas does not receive any compensation from Connectus for serving our clients.

For additional information about these conflicts and how we address them, please refer to ltem 10 and ltem 10 of our Brochure.

How do your financial professionals make money?

Our Firm's financial professionals are compensated through salary and bonus or a share of the Firm's profits. A portion of that compensation is correlated to the amount of client assets they service, the revenue our Firm earns from the financial professional's services and/or whether the financial professional has been successful in increasing amount of client assets under the Firm's management. Some of our financial professionals are eligible for additional compensation from our indirect parent company, Focus Financial Partners, LLC (or one of its affiliates), depending on our annual revenues and/or earnings. This potential for increased compensation provides an incentive for these financial professionals to encourage you to maintain and even increase the size of your investment account with us. See your financial professional's ADV Part 2B Brochure Supplement for more information about your individual financial professional's compensation. Compensation of our Firm's financial professionals is unrelated to the type of product client assets are invested in.

Item 4: Do you or your financial professionals have legal or disciplinary history? Conversation Starters. Ask your financial professional "As a financial professional, do you have any disciplinary history? For what type of conduct?"

Yes. You can go to <u>Investor.gov/CRS</u> for free and simple search tool to research our Firm and our Firm's financial professionals.

<u>Item 5</u>: Additional Information <u>Conversation Starters. Ask your</u> <u>financial professional</u>

"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?"

For additional information about our investment advisory services, and to request a copy of Form CRS, please contact our Chief Compliance Officer at (518) 482-5777 or via email cco@atlaspwm.com