



McBroom & Associates LLC Relationship Summary

Introduction

McBroom & Associates, LLC is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for retail investors to understand the 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 advisers, and investing.

Relationships and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail investors.

Our investment management is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Through personal discussions in which goals and objectives based on a client's particular circumstances are established. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We also review and discuss a client's prior investment history, as well as family composition and background, as appropriate.

Our services are provided on a discretionary basis, which means that we are authorized to make investment decisions without the client's prior approval. Our services are provided on a continuous and ongoing basis, and we monitor our clients' portfolios on an ongoing basis. In general, minimum of \$1,000,000.00 of assets under management is required for our service.

Additional Information:

You can find more detailed information about the services we offer in our Firm Brochure, Form ADV Part 2A, Items 4 and 7.

Conversation Starters:

1. "Given my financial situation, should I choose an investment advisory service? Why or why not?"

2. "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 and Costs

What fees will I pay?

Our annual fees for investment advisory services are based upon a percentage of assets under management, account size, and the types of investments as follows:

- 1% for equity and ETF investments
- 0.4% for fixed income (such as municipal bonds) investments
- 2% for accounts significantly below the minimum size

So, in summary, our fees are generally 1%, but can range from 0.4% to 2.0%

McBroom & Associates, LLC retains the right to negotiate an alternative fee schedule on a client-by-client basis depending on client circumstances. These include client complexity, anticipated future assets, related accounts, portfolio style, and account composition. The annual fee includes cash held in the account because we use cash as a position or investment category depending on market conditions.

Our fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the custodian reported value of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the client contract.

Clients may incur charges for other account services provided and not directly related to the execution and clearing of transactions, including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for transfers of securities.

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. *You can find more detailed information about our fees and costs in our Firm Brochure, Form ADV Part 2A, Item 5.*



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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?"

Conflicts of Interest

McBroom & Associates, LLC, has elected to adopt a Code of Ethics (the "Code") that it and its associates will follow in dealing with their clients.

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 must 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: The firm's personnel will at times buy/ sell for their personal account(s) investments identical to those recommended to or owned by clients. Alternatively, the firm could cause clients to buy a security in which the firm's personnel have an ownership position. Such practices present conflicts of interest. To mitigate these conflicts, such recommendations will only be made if they are believed to be in the best interests of the client. Additionally, as part of the firm's fiduciary duty to clients, the firm requires its personnel to adhere to the Code of Ethics, which contains procedures relating to personal trading. Moreover, some custodians provide us with access to institutional trading and custody services, as well as other products and services that may not benefit you directly. This creates an incentive for us to recommend those particular custodians.

Additional Information:

You can find more detailed information about our conflicts of interest in our Firm Brochure, Form ADV Part 2A, Items 10, 11, and 12.

Conversation Starter:

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

How do your financial professionals make money?

Our financial professional receives a salary for his services. Because our financial professional is also the firm's owner, he also shares in the firm's profits.

Disciplinary History

Do you or your financial professionals have a legal or disciplinary history? No

Additional Information:

Visit Investor.gov/CRS for a free and simple search tool to research you and your financial professionals.

Conversation Starter:

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

Additional Information

You can find additional information about our investment advisory services and request a copy of our relationship summary.

Website: [NONE](#)

Telephone: (702) 267-6649

Email: martin@mcbrominv.com

Mail: 1635 Village Center Cir, Ste 140, Las Vegas NV 89134-6375

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?"