

**The Clark Group Asset Management**  
**Form CRS Customer Relationship Summary**  
**March 30, 2023**

The Clark Group Asset Management (“CGAM”) is an investment adviser registered with the U.S. Securities and Exchange Commission (“SEC”). The services of and fees for brokerage and investment advisory services differ and it is important for you to understand those differences. Free and simple tools are available to you to research CGAM, other firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS), where you may also find important educational materials about broker-dealers, investment advisers and investing.

**What investment services and advice can you provide me?**

We offer investment advisory services to retail investors like you. We also offer Financial Analysis and Planning. We gather information in order to analyze your financial situation. After the analysis, we will make investment recommendations based on our findings and your needs. Upon execution of an Advisory Agreement, we establish one or more accounts so we can manage the portfolio, and we will implement those recommendations and continue to manage the account. We monitor your portfolio investments on an ongoing basis and will periodically rebalance the accounts, as needed. Dependent upon market and other conditions, CGAM will recommend diversification of investment allocations to various asset classes, including cash, to help mitigate investment risks and potentially increase performance. We can recommend specific investments to increase sector weighting and/or dividend probability and can recommend employing complete cash positions as a possible hedge against market movement which can adversely affect your portfolio. Cash holdings (typically 2% of a client’s portfolio) will be represented by either money market funds or cash equivalents. Our financial planning services range from comprehensive planning to more focused consultations, depending on the needs of the client. We evaluate your financial, business and investment information and make recommendations with the intention of achieving your financial goals. We manage accounts on a discretionary basis or non-discretionary basis. When we manage your account on a discretionary basis, our firm has authority to determine the type of securities bought and sold, the dollar amounts of the securities to be bought and sold and whether your transaction should be combined with those of other clients and traded as a “block” without consulting you first. We maintain this discretion until it is revoked. Non-discretionary basis means you make the ultimate decision regarding the purchase or sale of investments. We impose an account minimum of \$250,000 per household to open an account. We reserve the right to waive or reduce our account minimums, management fees and/or performance fees with respect to any client for any of the Firm’s employees and/or family members. Please note that the Firm has clients with similar portfolios which are assessed different fees based on a variety of factors as described further in Item 5 of Form ADV Part 2A. All fees are subject to negotiation subject to CGAM’s sole discretion. Furthermore, the Firm can negotiate fees with future advisory clients that are different than its standard fee schedule.

**Ask your financial professional the following questions:**

*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 further information about our services and advice, please read Items 4, 5, 7, and 8 of our Form ADV Part 2A disclosure brochure. Click [here](#) for a copy or contact us by phone at (949) 558-3898.*

**What fees will I pay?**

We charge an annual asset management fee, which is calculated and billed quarterly in advance and based on the market value (including cash, cash equivalents, accrued interest and dividends, and any margin balance) of your account(s) as of close of business the last business day of the preceding calendar quarter. Having a margin balance creates a conflict of interest since this can result in our fee being higher. Our asset management fee is a flat percentage rate ranging from 1.0% - 2.0%, which is determined when you engage us and based on the amount of assets under management you have in your managed account(s). For qualified clients, we offer a performance-based fee. The assessment of performance-based fees will be done in accordance with all requirements for such compensation arrangements specified by Rule 205-3 of the Investment Advisers Act of 1940. For Financial Planning services, the Firm charges a fixed fee and/or hourly fee. Fixed fees can be assessed as a one-time or an ongoing fee dependent upon the services received. Generally, rates range from \$500 to \$10,000 on a fixed fee basis, or from \$250 to \$350 on an hourly rate basis. These rates can be negotiated at the

sole discretion of the Firm. Clients generally pay 50% of the estimated fee upon execution of the Agreement. An invoice is issued on completion of the written analysis, payable upon receipt. You can terminate the Agreement, without penalty, any time, upon written notice. At termination, any prepaid fees are prorated as of the date, the notice of termination is received, and any unearned fees returned to you. The fees described above do not include certain charges imposed by third parties such as custodial and mutual fund fees and expenses. You may be subject to transaction costs, deferred sales charges on mutual funds, 12b-1 fees, wire transfer and electronic fund fees, and other fees and taxes. These fees and expenses are separate from fees charged by us. You should review fees charged by any mutual funds your assets are invested in, together with the fees charged by us, to understand the total fees to be paid and evaluate the advisory services being provided. 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.

**Ask one of our financial professionals the following questions:**

*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?*

*More detailed information about our fees and other costs associated with investing, along with applicable conflicts can be found in Items 5, 10, and 14 of our Form ADV Part 2A disclosure brochure. Click [here](#) for a copy or contact us by phone at (949) 558-3898.*

**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. You should understand a conflict of interest exists when providing Financial Planning, as we have incentive to recommend our own services, since we receive additional compensation for such services. You should understand these conflicts as they can affect the investment advice we provide. No investment adviser representatives of CGAM are currently engaged in any outside business activities or have any outside affiliations.

**Ask your financial professional:**

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

*More detailed information about our conflicts of interest can be found in Items 4, 5, 8, 10, 11, 12, and 14 of our Form ADV Part 2A disclosure brochure. Click [here](#) for a copy or contact us by phone at (949) 558-3898*

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

The principal owners of CGAM are Ray Clark, Founder and CEO, and Eric Cedergreen, President and Chief Compliance Officer. For these services, they receive a salary and proportional profits from the earnings of CGAM. Information about compensation for CGAM professionals and related conflicts of interest are found in our Form(s) ADV Part 2B. Form ADV Part 2B for our Representatives is available through us at: 2491 Dana Point Harbor Drive, Suite C210 Dana Point, CA, 92629 or by phone at (949) 558-3898.

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

Yes. Please go to [www.Investor.gov/CRS](http://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?*

**Additional Information**

Additional information and a copy of this Form CRS can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching “The Clark Group Asset Management” or by contacting us at 2491 Dana Point Harbor Drive, Suite C210 Dana Point, CA, 92629 or by phone at (949) 558-3898.

**Ask your financial professional:**

*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?*

**EXHIBIT A**

**AMENDED FORM CRS  
CLIENT RELATIONSHIP SUMMARY  
THE CLARK GROUP ASSET MANAGEMENT  
March \_\_, 2023  
SUMMARY OF MATERIAL CHANGES**

**What investment services and advice can you provide me?**

Updated to reflect that we monitor your investments on an ongoing basis.

**What fees will I pay?**

Updated to clarify that: (i) the assets under management that your quarterly fee is based on includes cash, cash equivalents, accrued interest and dividends and any margin balance, (ii) having margin on your account creates a conflict of interest since it raises our fee, and (iii) our fee range is based on your assets under management upon engagement.