Introduction

Our firm, Weigel Fiduciary Asset Management, is registered as a mid-sized investment adviser with the U.S. Securities and Exchange Commission. 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 <u>Investor.gov/CRS</u>, which also provides educational materials about broker-dealers, investment advisers, and investing.

Relationships and Services

What investment services and advice can you provide me?

Services: We provide comprehensive financial planning, analysis, and asset management services to retail, small business, and corporate executive investors. These services include stress-tested scenario planning, investment and vehicle research, blend of strategies portfolio construction/modification, and discretionary as well as nondiscretionary portfolio management. We work closely with each client to assess individual needs, objectives, and goals with respect to risk tolerance in order to provide customized planning and total asset management solutions.

Accounts, Investments, and Monitoring: We provide services to individual, joint, executive, retirement, business, trust, and estate accounts. We primarily use individual securities, mutual funds, exchange-traded funds, stocks, bonds, options, structured products, and alternative investments in constructing and recommending modifications to client portfolios. We do not make available or offer advice with respect to only proprietary products or a limited menu of products or types of investments. As part of our standard services, we analyze, monitor, and manage portfolios and securities held internally as well as externally depending on client preference and availability of robust data fees. We provide each client with retirement and investment, cash flow, and sensitivity analyses and establish specific communication plans for each sleeve of core diversification we help manage. We communicate no less than quarterly and offer to meet with you at least annually or more frequently, depending on qualified life events and/or client-specific needs.

Investment Authority: We recognize time/price execution as paramount with respect to the goal of long-term performance and the need to meet client objectives. As such, we manage assets under management on a discretionary basis with respect to each of our 6 identified major diversification sleeves. Clients always maintain the role of final decision maker as to allocation to each diversification sleeve. We also offer nondiscretionary investment advice and analysis for assets held away as assets under advisement. We also offer a grace period under a separate fee structure to allow clients time to get comfortable and understand the discretionary management model. Clients wishing to initially engage us under this "accommodate group" with be required to sign a customized fee for service agreement and specific instructions as to which assets are to be managed on a discretionary vs nondiscretionary basis. Our engagement will continue until you notify us otherwise in writing.

Account Minimums & Other Requirements: We require an account or relationship size minimum of \$500,000 in which we may waive at our discretion under certain circumstances.

Additional Information: For more detailed information on our relationships and services, please see Item 4 – Advisory Services, Item 13 – Review of Accounts and Item 7 – Types of Clients of our Form ADV Part 2A available via our firm's Investment Adviser Public Disclosure Page.

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?

Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Asset-Based Fees: Our asset-based fees for investment management range from 0.60% to 1.25% annually based on a tiered schedule. This fee is collected on a monthly basis and calculated as a percentage of the value of the cash and securities in your collective household account[s] that we manage. We do not participate in any transaction-based compensation; however, this may present a conflict of interest as we are financially incentivized to encourage you to place more assets in your advisory account as you will ultimately pay more in advisory fees. We do not participate in any revenue-sharing agreements with anyone and do not participate in recommendations made to invest outside of us.

Other Fees & Costs: In addition to our advisory fee, you may at some point be responsible for platform fees, custody fees, account administrative fees. However, currently there are none for clients of Weigel Fiduciary Asset Management. Clients are, however, responsible for a \$25 ticket charge on certain mutual funds as well as the underlying operating expenses for institutional class mutual funds and ETFs which we expect to be ongoing. There also may or may not be ticket charges to sell certain bonds or structured investments from time to time.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Management Fees and operating costs of funds 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. Of note – our fee structure is built to incentivize us to grow assets and disincentivize us for losses. Transaction frequency has no part in our compensation structure. For more detailed information on our fees, please see Item 5 – Fees and Compensation of our Form ADV Part 2A available via our firm's Investment Adviser Public Disclosure Page.

Conversation Starters: 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 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 interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. 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.

As fee-only fiduciary advisors and portfolio managers, we are regulated and governed under separate and different rules and regulations than brokers. We no longer maintain a series 7 broker's license. The Fiduciary Standard at the RIA level involves SEC filing, regulation and ongoing audits, multiple forms of disclosure documents as well as confirmed client delivery, required fee transparency, and the elimination of unequal compensation related to investment vehicle recommendation. However, we do expect that some underlying investments will lose money. We do not have any benefit involved in an investment that losses value.

Additional Information: For more detailed information, please see Item 10 – Financial Industry Activities and Affiliations, Item 12 – Brokerage Practices and Item 14 – Client Referrals and Other Compensation of our Form ADV Part 2A available via our firm's <u>Investment Adviser Public Disclosure Page</u>.

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

How do your financial professionals make money?

Our financial professionals are compensated based on the revenue generated from advisory services. This means our financial professionals have an incentive to increase the asset size in the relationship or solicit new business, taking time away from the day-to-day servicing of existing clients.

Disciplinary History

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

Yes. You can visit <u>Investor.gov/CRS</u> for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters: 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 by viewing our Form ADV Part 2A available via our firm's <u>Investment Adviser Public Disclosure Page</u> or by visiting. You can request up to date information and a copy of our client relationship summary by contacting us at <u>David@WeigelFAM.com</u> or (646) 872-0632.

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