

## ITEM 1 - INTRODUCTION

RightOak Asset Management LLC (“ROAM,” “we,” or “Firm”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. One of the requirements of being a Registered Investment Adviser (“RIA”) is to produce this Client Relationship Summary. As an RIA, we do not sell products or accept commissions. We have a fiduciary responsibility to our clients and are legally required to act in their best interests. This differentiates us from brokerage firms, which offer other types of services, fee structures, and working relationships. Brokerage and investment advisory services and fees differ, and it is important to understand these differences, which is why the SEC provides free and simple tools for researching financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS). This site also provides educational materials about investment advisors, broker-dealers, and investing.

## ITEM 2 – WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

ROAM offers investment advisory services to retail investors. Our firm manages accounts on a discretionary basis. In a discretionary account, you have granted written investment authority to your Financial Professional to execute purchase and sell orders in your advisory accounts without consulting with you first. You may limit our authority, such as by imposing reasonable restrictions on investing or trading in certain securities or groups of securities. As an investment adviser, we provide investment advice and monitoring to you through our Investment Adviser Representatives (“IARs”) for an ongoing fee. Our Firm generally requires a minimum portfolio value of \$250,000 to provide advisory services to you. If deemed appropriate for you, our Firm will recommend utilizing a third-party money manager (“TPMM”) to aid in the implementation of investment strategies for your portfolio. In addition to our Investment Management Services, our Firm offers financial planning and consulting services for our clients. Financial Planning services can be provided on a stand-alone basis or in conjunction with investment management services.

**FOR MORE INFORMATION, PLEASE SEE ITEMS 4, 7, 13, AND 16 OF OUR FORM ADV 2A “BROCHURE.”**

### **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?*

## ITEM 3.A – WHAT FEES WILL I PAY?

We generally offer our advisory services for an annual investment advisory fee calculated as a percentage of the value of the assets that we manage in your account. Our advisory fees are calculated monthly in arrears, based on the market value of your account as of the last business day of the previous month. Fees are outlined in the fee schedule within your advisory agreement and will not exceed 2.00% annually. Our advisory fees are separate from brokerage commissions, transaction costs, ETF expenses, and other account-related fees. If your portfolio includes ETFs or mutual funds, their internal expenses are in addition to our advisory fees. Fee structures may vary by client based on the services provided. You will pay fees whether your investments gain or lose value, and these costs will reduce your overall returns. Since fees are typically based on the value of assets under management, the Firm has an incentive to encourage account growth. Clients who engage us for financial planning only may pay a flat or hourly fee. Flat fees generally range from \$2,000 to \$10,000, and hourly billing starts at \$400. Third-Party Money Managers (“TPMMs”) charge their own fees directly, outlined in their respective brochures or contracts. Custodians (e.g., SEI) may also charge transaction fees, custodial or administrative fees, and earn other revenue from fund management or platform services. Our Firm does not receive any portion of these charges. All fees are billed as services rendered. All accounts managed by ROAM will be subject to a platform fee of \$25 per account(s) at the time of engagement and \$2.50 per month per account moving forward. This platform fee will be waived for accounts with \$2,750 or less in their account. Please review your advisory agreement for details and contact us with any questions about the fees you pay. 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.

**FOR MORE INFORMATION, PLEASE SEE ITEM 5 OF OUR FORM ADV 2A “BROCHURE.”**

### **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?*

### ITEM 3.B – WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY & WHAT CONFLICTS OF INTEREST DO YOU HAVE?

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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. 1) We earn more when your assets under management increase, which creates an incentive to encourage you to invest more. 2) We may recommend rolling over assets from a retirement account into an account we manage, even when lower-cost options are available. Our firm receives a fee as compensation for providing investment services on your account. We manage accounts for multiple clients and allocate our time based on each client's needs.

FOR MORE INFORMATION, PLEASE SEE ITEMS 5, 10, 11 AND 14 OF OUR FORM ADV PART 2A "BROCHURE."

**Conversation Starter:**

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

### ITEM 3.C – HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

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Our Financial Professionals are compensated based on the amount of assets they service, the amount of time spent, and the complexity required to meet the client's needs or revenue based on the recommendations provided. Some of our Financial Professionals are insurance licensed and receive commissions, trails or other compensation from the respective insurance companies as a result of effecting insurance transactions. However, you have the right to decide whether to act on the recommendation. We recognize our duty to prioritize your interests and have established policies to avoid conflicts. While some of our Firm's Financial Professionals are engaged in outside business activities, we must disclose material outside business activities and any conflict that it may pose to you. Our Firm supervises the business activities of our Financial Professionals through our compliance program. All Financial Professionals must follow a Code of Conduct to mitigate any conflicts with you.

FOR MORE INFORMATION, PLEASE SEE ITEMS 5, 10, 11, AND 14 OF OUR FORM ADV PART 2A "BROCHURE" AND REFER TO YOUR FINANCIAL PROFESSIONAL'S ADV 2B BROCHURE

### ITEM 4 – DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

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No. Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research RightOak Asset Management LLC and our financial professionals.

FOR MORE INFORMATION, PLEASE SEE ITEM 9 OF OUR FORM ADV PART 2A "BROCHURE" OR REFER TO ITEM 11 OF OUR PART 1

**Conversation Starter:**

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

### ITEM 5 - ADDITIONAL INFORMATION

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For additional information about our investment advisory services, visit the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's IARD number is 337832. You may also contact us for up-to-date information and request a copy of the relationship summary by contacting us at 517-306-4884.

**Conversation Starters:**

- *Who is my primary contact person?*
- *Is he/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?*