

## ITEM 1 – INTRODUCTION

RWM Asset Management, LLC (“RWM”, “our”, “we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a registered investment advisor. Investment advisory services and compensation structures differ from that of a registered broker-dealer, and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS). The site also provides educational materials about broker-dealers, investment advisors and investing.

## ITEM 2 – RELATIONSHIPS AND SERVICES

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

We provide discretionary investment advisory services to individuals, families and their related entities, trusts and estates, and businesses (our “retail investors”). Our services include discretionary Investment Management, Financial Planning and Family Office Services. When a retail investor engages us to provide discretionary investment management services, we monitor, on a continuous basis (at least quarterly), the investments in the accounts over which we have discretionary authority as part of our investment management service. Discretionary authority allows us, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade, and allocate the investments within your account(s) consistent with your investment objectives. Our discretionary authority over your account(s) continues until our engagement is terminated. To the extent requested by the retail investor, financial planning may be included as part of the investment management engagement as outlined in the scope of engagement. We may also provide financial planning or consulting services on a standalone basis. Information provided for financial planning is provided by the retail investor and we do not verify or monitor any such information while providing this service. Our financial planning and consulting services are completed upon the communication of our recommendations to the retail investor. We do not limit the scope of our investment advisory services to proprietary products or a limited group or type of investment, however, we may invest your assets in various proprietary RWM portfolios. We do not require a minimum asset level or impose a minimum annual fee for investment management services. RWM, in its sole discretion, may charge a lesser investment advisory fee, and/or charge a flat fee based upon certain criteria.

**Additional Information:** For more detailed information about our *Advisory Business* and the *Types of Clients* we generally serve, please See ITEMS 4 and 7, respectively in our ADV Part 2A. Also, please refer to Items 4 and 6 in our Wrap Brochure Supplement.

*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 – FEES, COSTS, CONFLICTS, and STANDARD OF CONDUCT

### **What Fees will I pay?**

We provide our investment advisory services on a fee-only basis. When engaged to provide discretionary investment management services, we charge a fee calculated as a percentage of your assets under our management (our “AUM fee”). Wrap program fees are generally negotiable and range from 0.50% to 1.80%, annually, depending upon the type of program or service selected and whether RWM or third-party manager models are used. Our non-wrap program fee is negotiable to a maximum fee of 2.00%. We deduct your advisory fee from your custodial account on a quarterly basis, in advance, based upon the market value of the assets under management on the last day of the previous quarter. Because our AUM Fee is calculated as a percentage of your assets under management, the dollar amount of fees you pay increases in accordance with the amount that we manage. Therefore, we have an incentive to encourage you to increase the assets maintained in the accounts we manage. We may recommend the use of certain third-party managers who will charge an additional management fee. We may also charge fees for certain reporting only services. We offer our financial planning services for a fixed fee ranging from a minimum of \$10,000 or on an hourly rate basis, at an hourly rate of \$100 to \$1500 per hour. Fees are based on the scope and complexity of the work to be performed.

A copy of our ADV Part 2A is available at:

[https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd\\_iapd\\_Brochure.aspx?BRCHR\\_VRSN\\_ID=626787](https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=626787)

**Other Fees and Costs:** Your investment assets will be held with a qualified custodian. Custodians charge transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds and fixed income securities transactions). Custodians assess various other service or administrative charges in accordance with their posted fee schedules. Wrap program clients pay a single investment management fee that is inclusive of custodial trading, custody and reporting costs. As a result, wrap advisory fees are typically higher than non-wrap advisory fees. In addition, relative to all mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund expenses).

**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. For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our ADV Part 2A or Item 4 of our Wrap Brochure Appendix.

*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 advisor? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment advisor, we have a fiduciary duty 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. As an example, to help you understand what this means, we may recommend a particular custodian from whom we receive support services and/or other products, which assist us to better monitor and service your account.

**Additional Information:** For detailed information about our conflicts of interest, please review our ADV Part 2A.

### **How do your financial advisors make money?**

Our financial advisors are compensated based upon the amount of assets they are responsible for managing and the advisory fees collected in connection with this management. Certain employees, however, are licensed to sell insurance products for which they receive a commission.

**Conversation Starters – Ask Your Advisor:** *How might your conflicts of interest affect me, and how will you address them?*

## **ITEM 4 – DISCIPLINARY HISTORY**

### **Do you or your investment advisors have legal or disciplinary history?**

No. We encourage you to visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) to research our firm and our financial professionals.

**We encourage you to ask your financial advisor:** *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

## **ITEM 5 – ADDITIONAL INFORMATION**

Additional information about our firm is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). You may contact our Chief Compliance Officer, Anthony Van Ore, at any time to request a current copy of our ADV Part 2A or this Relationship Summary. Our Chief Compliance Officer may be reached by phone: (352) 343-2700.

*Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

A copy of our ADV Part 2A is available at:

[https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd\\_iapd\\_Brochure.aspx?BRCHR\\_VRSN\\_ID=626787](https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=626787)