

Client Relationship Summary – Form CRS

Is An Investment Advisory Account Right For You?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

Item 1. Introduction

Tradition Wealth Management, LLC (“Tradition Wealth”, “Firm”, “We”, “Us”, “Our”) is an investment advisor and provides advisory services for a fee rather than for brokerage commissions. As a retail investor, it is important to understand the differences between services and fees of an investment advisor and a broker-dealer. *Investor.gov/CRS* offers free and simple tools to research firms and financial professionals. Additionally, it 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 offer the following investment advisory services to you:

Asset Management: We will offer you advice on a regular basis. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will monitor your account on a discretionary basis (we can buy and sell investments in your account without asking you in advance) and/or a non-discretionary basis (you make the ultimate decision regarding the purchase or sale of investments). We do not limit advisors to proprietary products or a limited menu of products and types of investments. This service will continue pursuant to the terms of the executed Advisory Agreement. We do not have a minimum to open an account.

Financial Planning: Services will be provided to you based on your selection on the Advisory Agreement and may include, but are not limited to, a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans that have recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. Services will be considered complete upon delivery of the plan.

Solicitor Services: We solicit the services of Third-Party Money Manager(s) (“TPM”) to manage your account(s). We act as the liaison between you and the TPM in return for an ongoing portion of the advisor fees charged by the TPM. We help you complete the necessary paperwork of the TPM, provide ongoing services to you, and will provide the TPM with any changes in your status as you provide them to us. We will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM. We do not have discretion on these accounts.

ERISA Services: We serve as a limited scope ERISA 3(21) Fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. Plans are monitored on an ongoing basis. We have a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using us can help the plan sponsor delegate liability by following a diligent process.

We act as an ERISA 3(38) Investment Manager where we offer discretionary management and control of a given retirement plan’s assets. We are solely responsible and liable for the selection, monitoring and replacement of the plan’s investment options on an ongoing basis.

Additional Information

For more information about our services, we recommend reading our ADV Part 2A Items 4, 5, 10.

Conversation Starter

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 are paid for our services as follows:

Asset Management: The amount paid to our firm and your financial professional generally does not vary based on the type of investments selected on your behalf. The asset-based fee reduces the value of your account and will be generally deducted from your account. Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Our fees vary and are negotiable. Generally, the more assets you have in the advisory account, the more you will pay in total fees. We therefore have an incentive to increase the assets in your account in order to increase our fees. You may pay a transaction fee when we buy and sell an investment for you, depending on the investment selected. You will also pay fees to a broker-dealer or bank that will hold your assets (called “custody”). You pay our advisory fee even if there were not transactions within the account.

Financial Planning: We charge an hourly or fixed fee with ½ payable upon signing the Advisory Agreement and the balance due upon completion of services.

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Solicitor Services: Our firm and our associated persons may be paid a portion of the fees charged and collected by the TPM in the form of solicitor fees or consulting fees. Our fees are negotiable depending on the size, complexity of the client’s account(s), the experience and training of the advisor and other business considerations. This situation creates a conflict of interest because we may select a TPM who would pay us a larger percentage of the fee. This conflict is mitigated by our fiduciary duty and adherence to our code of ethics. When referring clients to a TPM, the client’s best interest will be the main determining factor.

ERISA Services: The amount paid to our firm and your financial professional generally does not vary based on the type of investments selected on your behalf. The asset-based fee reduces the value of your account and will be generally deducted from your account. Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Also, with certain investments such as variable annuities, you may have to pay fees such as “surrender charges” to sell the investment. Our fees vary and are negotiable. Generally, the more assets you have in the advisory account, the more you will pay in total fees. We therefore have an incentive to increase the assets in your account in order to increase our fees. In some circumstances, we may charge you a fixed fee for our services rather than a percentage of assets in the Plan. You may also pay a transaction fee when we buy and sell an investment for you. You will also pay fees to a broker-dealer or bank that will hold your assets (called “custody”).

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 regarding our fees and costs, review ADV Part 2A Item 5.

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?

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.

Revenue Sharing: We have an arrangement where we share in a portion of the management fee with TPM. This does not change the cost to you, it is a sharing arrangement paid from the TPM’s portion of the advisory fee. The TPM will pay us a percentage of the net billing. This situation creates a conflict of interest because we may select a TPM who would pay us a larger percentage of the fee. This conflict is mitigated by our fiduciary duty and adherence to our code of ethics. When referring clients to a TPM, the client’s best interest will be the main determining factor.

Conversation Starter

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

Additional Information

For more information about our conflicts of interest, we recommend reading our ADV Part 2A, Items 4 and 10.

How do your financial professionals make money?

Our financial services professionals are compensated on a percentage of assets they manage, a portion of the total advisory fees received by us, hourly or fixed fees and sales commissions.

This is a conflict of interest because our financial professionals have an incentive to encourage you to increase your assets in your accounts, recommend our advisory services to you, and recommend you purchase investments that result in additional compensation to them. For more information about our conflicts of interest, we recommend reading our ADV Part 2A, Items 4 and 10.

Item 4. Disciplinary History

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

No, please visit Investor.gov/CRS for a free and simple search tool to research Tradition Wealth and our financial professionals.

Conversation Starter

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

Item 5. Additional Information

To find additional information about Tradition Wealth and to request a copy of the *relationship summary*, please go to www.TraditionWealthManagement.com or send us an email at markw@traditionwealth.com. If you would like to request up-to-date information as well as to request a copy of the *relationship summary*, please contact via phone at (952) 563-6520.

Conversation Starter

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



**PRIVATE
CLIENT
SERVICES™**
MEMBER FINRA, SIPC
A Registered Investment Advisor

CLIENT RELATIONSHIP SUMMARY

Private Client Services (“PCS”) is a Registered Broker/Dealer Firm and Registered Investment Advisor (“RIA”), dually registered with the Securities and Exchange Commission, is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). It is important for clients to understand that as a Broker/Dealer we offer investment services where PCS and our Registered Representatives earn a commission when we buy and sell securities for you, and as an RIA, we offer investment advice and investment advisory services for a fee. Our client base consists primarily of retail investors; however, we also serve institutional investors.

Free and simple tools are available to research firms and financial professionals at <https://www.Investor.gov/CRS>, which also provides educational materials about broker/dealers, investment advisors, and investing.

What investment services and advice can you provide to me?

We provide both brokerage services and investment advisory services to retail investors.

Brokerage services include buying and selling securities, including stocks, bonds, mutual funds, exchange traded securities, unit investment trusts, and variable or index annuity products for retail investors. We provide investment recommendations, financial tools and investor education to retail investors in order to help investors achieve their investment goals and objectives.

Brokerage services may be processed via an investor brokerage account or directly with a product provider. Although the firm imposes no specific eligibility requirements or investment minimums, individual services, including the extension of margin privileges and options trading as well as individual product providers, may have additional requirements. Details can be obtained in the service agreements or product prospectuses.

Not all registered representatives of the firm are dually registered and may not be able to provide investment advisory services in addition to brokerage services. All representatives of the firm may not be appropriately licensed to sell all products of the firm and may only offer a subset in accordance with their license. In addition, the firm does not monitor your brokerage account and you make the ultimate decision regarding the purchase or sale of investments.

Investment advisory services include model portfolios managed by the firm called PCS Advisor Portfolios, Private Wealth Management (PWM) accounts managed by the advisor, portfolios managed by Third-Party Asset Managers (TPAM), and financial planning services all for a fee

PCS Advisor Portfolio accounts consist of exchange traded funds (ETFs) or mutual funds and may include additional asset types. They are managed on a discretionary basis by the firm and monitored regularly by the firm’s Investment Committee. There is a \$25,000 account minimum that may be waived on a case-by case basis.

Private Wealth Management (PWM) accounts may consist of ETFs, mutual funds, stocks, bonds and other asset types. These accounts are managed by the advisor according to a model established by the retail investor at the time of account opening. PWM accounts may be managed on a discretionary or non-discretionary basis depending on the retail investor's desire and are monitored by the firm on a regular basis. There is a \$25,000 account minimum that may be waived on a case-by case basis.

Third-Party Asset Management accounts utilize other professional money management services to create and manage retail investor portfolios. Each TPAM sets their own account minimums and portfolio design. We do not provide any input, or guidance in relation to the portfolio management of these accounts, however we do provide ongoing monitoring regarding performance. Details can be found in each TPAM's account documents.

Retail client accounts that are managed on a discretionary basis, means that the Investment Committee or adviser determines holdings allocation changes in various portfolios based upon market conditions, and executes the reallocation without consulting individual clients. Discretion is limited to portfolio holdings allocation and does not include the ability for the firm or adviser to process any money movement activity without the prior instruction and approval by the client. Non-discretionary means that you make the ultimate decision regarding the buying and selling of securities in your portfolio.

Financial planning services provided to our clients may include some or all the following: Business Planning, Retirement Planning, Estate Planning, Risk Management, Investment Consulting, Corporate Retirement Planning, and Insurance Planning. These services are provided by a separate engagement agreement established by the retail investor and adviser prior to any services.

We offer a Wrap Program to our clients, in which you may invest in certain products without paying commissions or transaction fees over and above the program's advisory fee.

Additional information on our advisory programs may be found by reviewing our Form ADV on our website www.pcsbd.net/advisory_disclosures.

We offer recommendations to retail investors that have been determined to be in their best interest.

Questions for you to ask your representative / advisor:

- *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?*

What fees will I pay?

For brokerage services, retail investors are charged transaction commissions and fees/expenses for buy or sell orders of individual stock or ETF securities within a brokerage account. Bonds are charged a markup or mark down in the price of the security being bought or sold. Investment products such as mutual funds, unit investment trusts and annuities charge initial fees, expenses, and commissions as part of the investment purchase price depending on the product purchased. Some products may charge ongoing management fees and commissions or trails as long that the product is held. These fees and expenses are outlined in the product prospectus.

Since commissions are charged on a transaction basis, you would be charged more when there are more trades in your account, therefore we may have an incentive to encourage you to trade more frequently.

Brokerage accounts also have additional account service fees depending on account activity. These fees may include services such as money movement, maintenance fees, transfer fees, etc. More detailed information on brokerage account fees may be found on our website www.pcsbd.net/Regulation_Best_Interest.

For advisory services, retail investors are charged an asset-based fee that is dependent on the value of the assets we manage. We charge this fee on a monthly basis. The higher the asset value in your account, the more you will pay in fees and therefore we may have an incentive to encourage you to increase the assets held in your account.

Asset-based fees associated with the wrap fee program (PCS Advisor Portfolios, Private Wealth Management and TPAM) will include most transaction costs and fees to a broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee. You may also pay additional account service fees depending upon account activity. These fees may include services such as money movement, maintenance fees, transfer fees, etc. More detailed information on brokerage account fees may be found on our website www.pcsbd.net/Regulation_Best_Interest.

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.

Questions for you to ask your representative / advisor:

- *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?*
- *How do you determine what fee I will be charged?*

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you.

Here are some examples to help you understand what this means:

- 1) Since commissions in a brokerage account are charged on a trade basis, a retail investor would be charged more when there are more trades in his or her account, therefore we may have an incentive to encourage a retail investor to trade often.
- 2) We charge an investment advisory fee based on the assets we manage. We have an incentive to recommend adding assets to accounts that we manage which will increase the fee you pay us.

3) Commissions on investment products vary and we may have an incentive to recommend a product that pays a higher commission.

4) We may receive additional compensation from brokerage fee mark ups, transition assistance and money market fund revenue sharing from our clearing firm and custodians.

Additional information related to potential conflicts of interest may be found by reviewing our Form ADV by visiting our website: www.pcsbd.net/advisory_disclosures.

Questions for you to ask your representative / advisor:

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

How do your financial professionals make money?

Our registered representatives receive compensation for commissions generated for securities or insurance sales in their capacity as broker-dealer representatives or insurance agents.

Our Investment Advisory Representatives receive compensation based on the amount of client assets maintained in advisory accounts, or fees charged for financial planning services.

Questions for you to ask your representative / advisor:

- *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?*

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

Yes.

Retail investors may visit www.Investor.gov/CRS for a free and simple search tool to research our firm and financial professionals.

Questions for you to ask your representative / advisor:

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

Retail investors can find additional information about our brokerage or investment advisory services and request a copy of this *relationship summary* by visiting our website www.pcsbd.net or calling 502-451-0600.