

Our firm, Adolos Asset Management, is registered as an investment advisor 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 Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors, and investing.

Relationships and Services

What investment services and advice can you provide me?

Services: We offer a personalized investment advisory platform to investors. We work closely with you to develop a personalized investment policy statement based on your financial goals, personal values, and risk tolerance. You then give us discretionary authority to buy, sell, or trade assets in your account without prior approval of each transaction. Implementation begins with our selecting the allocation strategies appropriate for your risk appetite. While we do not offer financial planning, we may, upon request, perform incidental planning services at our discretion. For more information on our services please see Items 4 & 8 provided in our Form ADV Part 2A Brochure.

Accounts, Investments, and Monitoring: We provide services to individuals, ultra-high-net-worth individuals, trusts, estates, corporations, foundations, and charitable accounts. We primarily use low-cost, diversified individual stocks, bonds, mutual funds, exchange traded funds (ETFs), and/or third-party investment managers in building your portfolio. The scope of our services is as broad as possible, meaning we do not limit you to a small choice of products and services. We monitor your portfolio and securities in your account on a regular basis. We also meet with you at least annually, or more frequently, depending on your needs. For more detailed information on our investments and monitoring, please see Items 8 & 13 provided in our Form ADV Part 2A Brochure.

Investment Authority: We provide our services on a perpetual and discretionary basis. We execute investment recommendations in accordance with your investment objectives without your prior approval of each specific transaction. Our engagement will continue until you notify us otherwise in writing. You can make deposits or withdrawals in your account at any time or place restrictions on the types of investments in your account or portfolio. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over your accounts). You will also be responsible for executing an Investment Management Agreement that outlines both of our responsibilities. In limited circumstances, you may engage us on a non-discretionary basis where you make the ultimate decisions on investments.

Account Minimums & Other Requirements: We do not require an account or relationship size minimum in order for you to open or maintain an account or establish a relationship. We select clients based on personal relationships and our ability to add value.

Additional Information: For more detailed information on our relationships and services, please see Items 4, 7, 8 & 13 provided in our Form ADV Part 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 or other qualifications? What do these qualifications mean?*

Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Asset-Based Fees: Our standard advisory fee is based on the market value of your assets under management (“account value”). In calculating the market value, assets allocated to cash or a cash proxy, such as a money market fund, will be included in the calculation. There is a conflict of interest when charging an asset-based fee, since we have an incentive to encourage you to increase the assets in your account. You pay a quarterly fee regardless of the activity in your account. Fees may be modified based on factors such as total assets with us or other factors that in our view may either increase or reduce expenses associated with the administration of a client account. Our advisory fees are charged pro-rata using a tiered system:

Account Value	Annual Advisory Fee
\$0 - \$3,000,000	.95%
\$3,000,001 - \$10,000,000	.80%
\$10,000,001 - \$50,000,000	.60%
\$50,000,001 - \$100,000,000	.50%
\$100,000,001 – and above	.35%

Other Fees & Costs: In addition to our advisory fees, mutual funds, ETFs, third-party managers, and sub-advisors may charge ongoing management fees. Various transaction fees to the custodian or other brokerage firm associated with the custody, purchases and/or sales of assets in your account may also be incurred. There are no additional fees payable to us.

Additional Information: You will pay fees and costs whether you gain 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 on our fees, please see Item 5 provided in our Form ADV, Part 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?*

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?

As a fiduciary, when we act as your investment advisor, 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 certain conflicts with your interests. A conflict of interest exists because the total fees you pay us increase with the size of your account. This creates an incentive for us to recommend that you increase the assets, or risk level, in your account. However, an increase in account assets may also result in a reduction in your asset-based investment management fee. Another example is when calculating your market value, assets allocated to cash or a cash proxy, such as a money market fund, are included in the calculation of assets under management. This prevents a conflict of interest. Otherwise, we would benefit by your account containing less cash and more investments. We attempt to avoid and remove all conflicts of interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Additional Information: For more detailed information regarding conflicts of interest, please see Items 5 & 6 provided in our Form ADV, Part 2A Brochure.

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

How do your financial professionals make money?

Our sole source of income is the advisory fees collected from you and other clients. We are not awarded sales bonuses. This means we have an incentive to maintain, service, and increase the asset size of existing relationships as well as solicit new business. This may take some time away from the on-going servicing of current clients.

Disciplinary History

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

No one at Adolos AM has a legal or disciplinary history. You can visit [Investor.gov/CRS](https://www.investor.gov/crs) 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 Brochure available on IAPD on [Investor.gov](https://www.investor.gov) and our website www.AdolosAssetManagement.com, or by calling us at (704) 472-1214. You can obtain a hard copy of this Form CRS or the Forms ADV Brochure by calling (704) 472-1214, emailing Matthew@AdolosAM.com or writing to us at 1346 Underpass Rd, Advance, NC 27006. If you have a problem with your investments, account, or financial professional, contact our Chief Compliance Officer Matthew Brinton via email at Matthew@AdolosAM.com or by mail to the above address, Attention: Compliance Department.

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?*