

Customer Relationship Summary

Item 1 Introduction: Woloshin Investment Management (WIM) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. 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 advisers, and investing.

Item 2 Relationships and Services: What investment services and advice can you provide me?

We offer investment advisory and financial planning services to investors. *Investment Authority:* WIM accepts both discretionary and, at its sole discretion, non-discretionary accounts. WIM may be given the authority to exercise discretion on behalf of clients. WIM is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. WIM may accept, at its sole discretion, non-discretionary accounts. For non-discretionary accounts WIM does not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. All clients complete a Limited Power of Attorney (LPOA), executed by the client, giving WIM the authority to carry out various activities in the account. *Monitoring:* Woloshin Investment Management monitors client portfolios at a minimum on an annually or more or less often upon your request. Such reviews are conducted by the WIM's investment personnel and/or investment adviser representatives. More frequent reviews may be triggered by material changes in your individual circumstances, changes or shifts in the economy, changes in the management of mutual funds, or market shifts and corrections. For additional information, please see WIM's Form ADV, Part 2A Brochure (Items 4 and 7).

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, and Standards of Conduct: What fees will I pay?

Principal Fees and Costs: WIM offers investment management services for an annual fee based on the amount of assets under the Firm's management. Our Wrap fee schedule is described below:

Assets Under Management	Total Annual Advisory Fee*
Up to \$500,000	1.97%
Next \$500,000	1.87%
\$1,000,001 to \$2,000,000	1.77%
\$2,000,001 to \$3,000,000	1.67%
\$3,000,001 to \$4,000,000	1.57%
\$4,000,001 to \$5,000,000	1.47%
Over \$5,000,000	1.37%

* WIM Managed Assets Program execution, custodial, and clearing fee is included in Total Annual Advisory Fee. This fee will be retained by WIM. All fees are negotiable at our sole discretion. There is a minimum quarterly fee of \$25 per account.

Financial Planning and Consulting Fees: WIM generally charges a fixed fee or fee based upon the net worth of assets held by the client (even if not managed by WIM) for providing financial planning and consulting services under a stand-alone or wealth management engagement. These fees are negotiable, but generally range from \$500 to \$25,000 on a fixed fee basis or up to 2% of net worth of assets, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services.

Other Fees and Costs: In addition to the advisory fees paid to WIM, clients may also incur certain charges imposed by other

third parties. In addition to our fee, you may be required to pay other charges such as: custodial fees, brokerage commissions, transaction fees, SEC fees, internal fees and expenses charged by mutual funds or exchange traded funds (“ETFs”), and other fees and taxes on brokerage accounts and securities transactions. WIM charges an **asset-based fee**; the more assets there are in a client’s account, the more a client will pay in fees, and the firm will therefore have an incentive to encourage the client to increase the assets in his or her account.

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 additional information, please refer to WIM’s Form ADV, Part 2A brochure Items 4, 5, and 7.

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 to you. Here are some examples to help you understand what this means: When we recommend an advisory account, a rollover of a retirement plan account, or provide additional services for compensation, these recommendations create an incentive to make these recommendations based upon the amount of compensation we receive, rather than based upon your needs. WIM financial professionals are also licensed insurance agents with various insurance companies. These arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation your financial professionals can receive rather than based upon your needs. American Fiduciary Services (AFS) is an affiliate company to WIM. Should you use AFS it will earn trustee fees for certain types of trustee accounts that WIM manages. Recommending AFS as a trustee creates an incentive to make these recommendations based upon the amount of compensation we receive, rather than based upon your needs.

Conversation Starter: How might your conflicts of interest affect me, and how will you address them? How do your financial professionals make money?

WIM’s financial professionals are compensated by cash compensation from the advisory and financial planning fees that we charge you. Our fee for services may vary depending on such factors as the amount of client assets we service, and the time and complexity required to meet your needs. Clients are advised that a conflict of interest exists when our financial professionals recommend our services to you, in that we will earn a fee from the services provided to you and the financial professional will be directly compensated from those fees.

Item 4 Disciplinary History: Do you or your financial Professionals have legal or Disciplinary history? Yes, Mr. Woloshin is the founder and Managing Director of WIM. Mr. Woloshin has the following events that are deemed reportable:

Arbitration claims above \$2,500:

- 9/24/2001 Client Alleged unsuitable transactions for \$100,000. Customer Dispute Settled for \$19,000. Broker contribution \$9,520
- 3/1/2000 Client alleged broker hired money manager unsuitable transactions for \$74,974. Customer Dispute Settled for \$14,000. Broker contribution \$7,000.
- 12/8/1993 Customer Alleged Churning \$56,500. Smith Barney settled. No Broker contribution.

Self-Regulatory Organization proceedings:

- 10/29/1990 NASD: Broker failed to offer mutual fund break points. Broker was censured, fined \$5,000 and customer restitution of \$10,000.
- 8/29/1997 NASD: Lacking reasonable basis for recommendations. Broker was censured, fined \$10,000 and suspended for five business days.

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

Search Tool: Please visit investor.gov/CRS a free tool to research WIM and our financial professionals.

Item 5 Additional Information: For additional information about our services, please refer to WIM’s Form ADV, Part 2A brochure Item 4 and Item 7. If you would like additional, up-to-date information or a copy of this disclosure, you may contact your finance professional, or you may call **(609) 654-9700** and request the Compliance Department.

Conversation Starter: 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?