

# CLIENT RELATIONSHIP SUMMARY

MARCH 4, 2024



Code Waechter, LLC (“CW”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

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

CW uses a planning process in order to develop a suggested blueprint of how to meet your goals and objectives. The process begins with a meeting to explain the services CW provides and to gather some information on you and what you expect from a relationship with CW. CW will then analyze your information such as cash flow, expenses, savings, goals and objectives. The process continues with how CW can assist you in implementing your blueprint through ongoing meetings as often as quarterly. Not every plan will be the same for every client and is specific to your unique financial situation and stage of life.

When we perform asset management services, it is typically on a discretionary basis. This means you give us the authority to make transactions within your accounts. The investments we manage within your portfolio are based upon your financial plan. If there is no financial plan in place, CW will establish your investment objectives and financial information through conversations with you. In some cases, we may manage accounts on a non-discretionary basis. In this case, we would manage your portfolio in the same manner; however, we would require your approval prior to making transactions. We allow for reasonable account restrictions and do not limit the type of investments available to our clients. We also may invest with third party managers, who have been carefully sourced and researched.

Clients that we advise may include individuals, families, trusts, charitable organizations and foundations, pensions and corporations. CW requires each client to place at least \$250,000 with the firm. This minimum may be waived in the discretion of CW.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients, which can be found by [CLICKING HERE](#).

### What fees will I pay?

In circumstances where the account minimum is not met, financial planning services are provided on a fixed fee basis ranging from \$750 to \$6,000 depending on your engagement of CW. This fixed fee can be waived in the sole discretion of CW. We prefer that financial planning fees are paid by auto credit card payment through AdvicePay, but it is not required. If you have your financial planning fees debited from your bank account, you will need to provide written consent to AdvicePay.

Asset management fees are as follows:

Asset level		Advisory Fee
\$0	\$500,000	0.95 %
\$500,001	\$1,000,000	0.90 %
\$1,000,001	\$2,000,000	0.65 %
\$2,000,001	\$3,000,000	0.50 %
\$3,000,001	and over	0.35 %

Asset management fees are debited directly from your account at the custodian. The fee is paid monthly, in arrears, based upon the average daily balance of the account for the previous month. The average daily balance is the sum of your balance on each day of the previous month divided by the number of days during that month. This means that if your annual fee is 1.00%, we will take the previous month’s average daily balance, multiply the value by 1.00%, and then divide by the number of days in that calendar year and multiply that number by days in the previous month to calculate our fee.

There are a number of other fees that can be associated with holding and investing in securities. Some of these fees includes: custodian fees, account maintenance fees, fees related to mutual funds and variable annuities, and other transactional fees and product-level fees.

*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 specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation by [CLICKING HERE](#).

### **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's example to help you understand what this means.

For example, certain professionals of CW are separately licensed as independent insurance agents. As licensed insurance agents, these professionals will receive commissions on insurance transactions in addition to any compensation from advisory business. These professionals have incentive to recommend insurance products based on the compensation to be received, rather than on your needs, which creates a conflict of interest. We attempt to mitigate this conflict of interest by disclosing the conflict, and letting you know you are always free to purchase insurance products through other agents that are not affiliated with CW, or to determine not to purchase the insurance product at all. CW also requires employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of CW, which requires that employees put the interests of clients ahead of their own.

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

We are paid a portion of the asset management fees collected from clients and not rewarded with sales bonuses or commissions related to advisory accounts. However, as noted above, insurance agents may earn a commission for the sale of insurance that they recommend.

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

No. CW has no legal or disciplinary history. Feel free to go to [Investor.gov/CRS](http://Investor.gov/CRS) for a simple search.

### **Additional Information**

You may find additional information about CW by [CLICKING HERE](#) or calling (813) 287-8775 to request up-to-date information and a copy of the relationship summary.

### **Here are some suggested 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?”*
- *“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 might your conflicts of interest affect me, and how will you address them?”*
- *“As a financial professional, do you have any disciplinary history? For what type of conduct?”*
- *“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?”*