

Client Relationship Summary  
GW & Wade Asset Management Company, LLC  
September 30, 2022

Item 1. Introduction

We (GW & Wade Asset Management Company, LLC or “GWWAMC”) are registered with the United States Securities and Exchange Commission as a broker-dealer and are a FINRA member firm. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences between them. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2. What investment services and advice can you provide me?

We offer brokerage services to retail and high net worth investors. The principal brokerage services are execution of securities transactions in stocks, fixed income securities, mutual funds, and 529 plans, and related administrative servicing of client accounts. GWWAMC is an introducing broker dealer which clears through National Financial Services, LLC (NFS). NFS executes your transactions and holds your assets for safekeeping. We predominately provide brokerage execution services to clients who also have an advisory relationship with GW & Wade, LLC (GWW), our affiliated registered investment adviser. We do not have account minimums. We also have a limited number of “Brokerage Only” accounts for clients that do not have an advisory relationship with GWW, or have an advisory relationship with GWW but maintain one or more self-directed accounts. We *do not* provide investment recommendations or monitoring for Brokerage Only accounts. You make the decisions whether to purchase or sell your investments in Brokerage Only accounts without input from GWW or GWWAMC. If you are an advisory client of GWW and we provide execution services for those accounts, all investment recommendations and account monitoring services are made exclusively by GWW as the investment adviser to your account. For additional information, please refer to GWW’s [ADV Part 2A Brochure](#), specifically [Item 4](#) (Advisory Business) which includes a more detailed discussion of GWW’s services versus GWWAMC’s services.

***Ask us: “Given my financial situation, should I choose a brokerage service? Should I choose an investment advisory service? Should I choose both types of services? Why or why not? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”***

Item 3. What fees will I pay?

For brokerage services, we charge transaction-based fees. There are many types of transaction based-fees. However, in general we are compensated through (i) commissions; and (ii) ticket charges, which are fixed amounts and do not vary based on the value of your investment; The more transactions you make in a brokerage account, the more transaction fees we earn. Our receipt of transaction-based compensation incentivizes us to encourage you to trade often. We mitigate this conflict because we do not recommend securities transactions for Brokerage Only accounts. Also, we receive distribution fees called “12b-1 fees” from some mutual fund companies based on the value of your investment in certain fund shares. These fees are paid to us by the mutual fund companies for as long as you continue to hold those mutual fund shares. When GWW acts as your investment adviser, we have a financial incentive to recommend that you use GWWAMC to execute your securities transactions based on compensation received for our brokerage services rather than on your needs or based on the broker dealer which can provide best execution. For all types of accounts other than GWW’s remaining Legacy Non-Discretionary Accounts, we mitigate this conflict of interest by allowing you to select a broker-dealer of your choosing. GWW also credits you 12b-1 fees paid if GWW charges you an advisory fee on the same assets.

In addition to these fees, you will be responsible for other fees and expenses associated with the investment of your assets. These fees include, where applicable, account opening and maintenance fees, custodial fees, margin interest, odd lot differentials, transfer taxes, block order trading fees, wire transfer and electronic fund fees, and other related costs and expenses charged by unaffiliated broker-dealers and your custodian. For additional information on GWWAMC’s and GWW’s fees and compensation, please refer to GWW’s [Form CRS](#), and GWW’s [ADV Part 2A Brochure](#), specifically [Item 5](#) (Fees and Compensation), [Item 10](#) (Other Financial Industry Activities and Affiliations), [Item 12](#) (Brokerage practices and Commission Schedule), and [Item 14](#) (Client Referrals and Other Compensation).

*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.*

**Ask us: “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 providing recommendations? How else does your firm make money and what conflicts of interest do you have?**

We *do not* provide securities, investment or account-type recommendations. The way we make money creates some conflicts with your interest. You should understand and ask us about these conflicts because they can affect the services we provide you. Here are some examples to help you understand what this means. As described above, in addition to the transaction-based fees we receive 12b-1 fees. Receipt of 12b-1 fees from mutual funds generates compensation for GWWAMC and its personnel and constitutes a conflict of interest because we have an incentive to purchase mutual fund shares based on our compensation rather than on your needs. We mitigate this conflict by not making investment recommendations and crediting 12b-1 fees if GWW receives an advisory fee based on the value of shares of a mutual fund.

For additional information, please refer to GWW’s [Form CRS](#), and GWW’s [ADV Part 2A Brochure](#), specifically [Item 5](#), [Item 12](#), and [Item 14](#).

**Ask us: “How might your conflicts of interest affect me, and how will you address those conflicts?”**

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

Our financial professionals are compensated based on revenue contributions or with a salary and discretionary bonus and on a limited basis. Registered Representatives of GWWAMC also receive compensation from the sale of certain mutual fund share classes. Those professionals who are also representatives of our affiliated investment adviser, GWW also receive compensation from financial planning fees, and advisory fees that are charged as a percentage of your assets under management. Some of our financial advisers are eligible for additional compensation from our indirect parent company, Focus, or one of its affiliates, depending on our annual revenues and/or earnings. This potential for increased compensation provides an incentive for these advisers to encourage you to maintain and even increase the size of your investment account with us. See your financial adviser’s Brochure Supplement for more information about your individual financial adviser’s compensation. For additional information about GWW’s investment advisory services, please refer to GWW’s [Form CRS](#), and GWW’s [ADV Part 2A Brochure](#), specifically [Item 5](#), [Item 12](#), and [Item 14](#) and [GWW’s ADV Supplement, Part 2B](#).

**Ask us: “What conflicts are associated with the way your financial professionals are paid and how do you address those conflicts?”**

**Item 4. Do you or your financial professionals have legal or disciplinary histories?**

Yes. You can go to [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and our firm’s financial professionals.

**Ask us: “As a financial professional, do you have any disciplinary history? For what type of conduct?”**

**Item 5. Additional Information.**

For additional information about our brokerage services, or to request a copy of Form CRS, contact 781-239-1188.

**Ask us: “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?”**