



Client Relationship Summary (Form CRS/ADV Part 3) – March 30, 2021

Is an investment advisory account right for you?

Palladium Registered Investment Advisors is registered with the Securities and Exchange Commission (SEC) as an investment adviser. 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. We provide advisory accounts and services rather than brokerage accounts and services. 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 www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing. This document gives you a summary of the types of services we provide and how you pay.

What investment services and advice can you provide me?

Description of Services

We offer investment advisory and financial planning services dependent upon your current financial situation, investment goals and risk tolerance by gathering information through client meetings and investment profile statements. As part of our standard account management services we create an asset allocation strategy and investment portfolio through a combination of securities using a separately managed account. Such securities include stocks, bonds, exchange traded funds, mutual funds, cash-equivalents, options, and where appropriate, illiquid alternative investments (i.e., hedge funds, real estate, private equity, promissory notes, and venture capital). We monitor your account(s) daily and meet with you as often as you deem appropriate.

A **non-discretionary** account is where you will make the ultimate decision regarding the purchase or sale of investments. Our standard investment management services are implemented on a **discretionary** basis, allowing us to buy and sell securities whenever we believe changes are appropriate without your approval. Account supervision is guided by your stated Investment Policy Guidelines. You can impose restrictions on investing in specific securities or types of securities by notifying us in writing. Any restrictions you place on your account(s) will remain in effect until rescinded by you. Capital market conditions along with triggering events such as contributions and distributions are monitored daily and portfolio adjustments are made as needed.

Our firm does not impose a formal account or relationship minimum; however, we feel our services are best suited for account sizes of \$1 million or more.

Additional Information

For additional information on our services, please see our [ADV, Part 2A Items 4 and 7](#) available on our website at www.palladiumllc.com.

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?*

What fees will I pay?

Principal Fees & Costs

Palladium's standard fee is based on a percentage of the value of the assets in your account(s). Our asset-based fee is charged quarterly in arrears. The amount paid to our firm does not vary based on the type of investments we select on your behalf. Our fee is billed even if we do not buy or sell securities in your account. The more assets you have in your advisory account, the more you will pay us. We therefore have an incentive to increase assets in your account to increase our fees. A \$3000 fee is charged for non-discretionary accounts in addition to our standard asset-based fee. A fixed fee may be negotiated when one of our financial professional's act as a Power of Attorney on your account. An hourly fee of \$150 - \$250 will apply to non-advisory clients who retain Palladium for investment consulting.

Some investments such as mutual funds, exchange traded funds and alternative investments impose additional fees that will reduce the value of your investments over time. Palladium's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses you may incur imposed by custodians, brokers or other third parties.

Additional Information

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. Additional information about our fees can be found under [Item 5 of our ADV, Part 2A](#) available on our website www.palladiumllc.com.

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?

Standards of Conduct

When we act as your investment adviser, we must 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.

- Certain custodians make free services available to us including consulting, access to research and conferences and events. These services give us an incentive to recommend you open or maintain accounts with these custodians.
- Certain custodians refer potential clients to us for professional account management and Palladium has a revenue sharing arrangement for such accounts. This service gives us an incentive to recommend you open or maintain accounts with these custodians. Our asset-based fee for these types of accounts is no greater than our standard fee schedule.

Conversation Starter

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

Additional Information

Additional information on conflicts of interest can be found in our [Form ADV, Part 2A Items 4, 10, 11 and 12](#) on our website www.palladiumllc.com.

How do your financial professionals make money?

Palladium's financial professionals are compensated with a cash salary and may receive additional compensation based on their personal performance goals which includes client retention, client satisfaction and business generation for the firm. This presents a potential conflict of interest in that our professionals have incentive to encourage you to increase the amount of assets in your account(s) managed by us or to transition your account(s) to our management.

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

No. Palladium and its financial professionals have not been subject to any disciplinary events by regulators nor is it a party to any legal events that are material to client evaluation of our advisory business. You can visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter

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

Where can I get additional information?

For additional information about our investment advisory services or to request a copy of our latest Client Relationship Summary, please visit our website at www.palladiumllc.com or call us at **757.305.1500**.

Conversation Starters

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