

## Form CRS Client Relationship Summary

### Tucker Asset Management LLC

July 10, 2021

#### Item 1 – Introduction: Is an investment advisory account right for you?

Tucker Asset Management LLC is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ and that 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.

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

We offer investment advisory services to retail investors. Our principal services include portfolio management and the selection of other advisers. Management services are offered on a *discretionary* basis. *Discretionary* authorization allows us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. We offer asset allocation and advisory services using proprietary portfolios models developed and managed by us or through models created and managed by various third party investment advisers. When we use third party investment advisers, they are responsible for the research and security selection and we are responsible for the implementation of transactions either directly or through the use of third party coordinators. As part of our standard services, we review your financial circumstances and investment objectives on an ongoing basis and we instruct the third party investment advisers to make the necessary adjustments to the client's portfolio to achieve the desired results. We do not limit our advice to proprietary products, or a limited menu of products or types of investments. In general, we require a minimum of \$1,000 to open and maintain an advisory account. At our discretion, we reserve the right to waive this minimum. Third party investment advisers may require different minimums.

For additional information, please refer to Items 4, 7, & 13 of our Form ADV Part 2A at the following link:  
<https://adviserinfo.sec.gov/firm/brochure/174844>.

*Conversation Starters. Ask your financial professional—*

- ❖ *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 – What fees will I pay?

We are primarily compensated by a percentage of assets under our management or supervision, hourly fees, fixed fees and solicitor/referral fees. Our fees vary depending on the services you receive. Portfolio management fees are based upon a percentage of your assets under management, and are payable monthly in arrears. The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account. In some cases, when we refer you to a third party investment adviser, we receive a portion of the third party investment adviser's fee as compensation. We provide financial planning services for an hourly or fixed fee. Our fees are negotiable depending upon the complexity of your goals and objectives and the level of services rendered.

For additional information regarding our fees, please see Item 5 of our Form ADV Part 2A at the following link:  
<https://adviserinfo.sec.gov/firm/brochure/174844>.

**Description of Other Fees and Costs:** In addition to our advisory fees that will be charged regardless of the value of each account, we also charge fixed administrative and technology fees. A portion of those fees are paid to our software provider(s). Some other advisers have direct trading access to client accounts and charge an additional account setup and margin maintenance fee per account per year. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by investment companies (e.g., mutual funds, exchange traded funds, and unit investment trusts, etc.). These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. Some broker-dealers/custodians charge transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian that executes the trade. The broker-dealer or custodian may also charge your account for custodial fees, retirement account fees, trust fees, exchange fees, redemption fees that may be assessed on investment company shares, transfer fees, account termination fees or other special service fees and charges. We do not share in any portion of these fees imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers/custodians, our firm, recommended third parties, and others.

**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 Item 5 of Form ADV Part 2A at the following link:  
<https://adviserinfo.sec.gov/firm/brochure/174844>.**

*Conversation Starter. Ask your financial professional—*

- ❖ *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 you. Here are some examples to help you understand what this means:

- All investment advisers face conflicts of interest which are inherent in the business. Our primary source of compensation is through asset based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management. Other conflicts of interest result from other business activities we engage in and relationships we have with business partners and third parties, or affiliations we have established with other financial institutions.
- In some cases, when we refer you to other advisers or third party programs, we share in the compensation received by the third party for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the third party. You are not required to use the services of any third party or program we recommend.
- We are affiliated with Tucker Advisory Group, Inc., a licensed insurance agency, through common ownership and control. Our affiliated agency and our financial professionals, who are also licensed insurance agents, will earn commission based compensation for insurance products they sell to you. This presents a conflict of interest since the fees paid to the firm for advisory services are separate and distinct from the commissions earned by our affiliate and our dually licensed financial professionals. You are not required to purchase insurance products through any firm or person affiliated with our firm.

*Conversation Starter. Ask your financial professional—*

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

**Please refer to our Form ADV Part 2A for further information on our conflicts of interest and how we address them at the following link: <https://adviserinfo.sec.gov/firm/brochure/174844>.**

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

Our financial professionals receive a percentage of advisory billings. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account. Our financial professionals are insurance agents. This creates a conflict of interest because these persons will receive additional commission-based compensation in connection with the purchase and sale of insurance products. You are not required to purchase insurance products through any firm or person affiliated with our firm.

#### **Item 4 – Do you or your financial professionals have legal or disciplinary history?**

Yes. Some of our financial professionals have legal or disciplinary history, but our firm has no applicable disclosures.

**For a free, simple search tool to research us and our financial professionals please visit [Investor.gov/CRS](https://Investor.gov/CRS).**

*Conversation Starter. Ask your financial professional—*

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

#### **Item 5 – Additional Information**

For additional information about our advisory services, please refer to our Form ADV Part 2A brochure available at <https://adviserinfo.sec.gov/firm/brochure/174844>, and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information and/or need a copy of this Client Relationship Summary, please contact us at **(303) 734-1234**.

*Conversation Starters. Ask your financial professional—*

- ❖ *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?*

**Appendix A - Form CRS Client Relationship Summary  
Tucker Asset Management LLC**

**Material Changes to Client Relationship Summary**

The purpose of this appendix is to inform you of any material changes since the previous version of this Form CRS dated March 29, 2021.

On July 10, 2021, we updated Item 2 to clarify that we now use proprietary portfolios models developed and managed by us in addition to models created and managed by various third party investment advisers. We also updated Items 2 and 3 to change the minimum account size from \$5,000 to \$1,000. Third party investment advisers may require different minimums.

If you have questions about these changes, you may contact us at (303) 734-1234.