

# ASG Investment Management LLC

## September 2020 Form CRS

ASG Investment Management LLC (“ASGIM”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an Investment Adviser. Brokerage and investment advisory services and fees differ. It is important for a retail investor to understand the differences. There are free tools available for investors to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS). This site also provides educational materials about broker-dealers, investment advisers, and investing.

### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

ASGIM offers investment advisory services to retail investors. These services include advice and selection and oversight of sub-advisors whose portfolios contain primarily exchange traded funds and equity securities.

Our firm offers the following types of advisory services: financial planning, investment management, separately managed accounts, and selection and oversight of sub-advisors. Our investment management services include ongoing monitoring of your investment portfolio as part of our regular services.

ASGIM’s standard investment management services include managing your account(s) with discretionary authority. This means we are authorized to make investment recommendations for your account(s) and can implement those recommendations for your account(s) without asking you in advance. ASGIM currently provides investment management services for its clients under discretionary authority.

Alternatively, ASGIM can manage your account(s) without discretion. This means we would make investment recommendations for your account(s) regarding securities. However, we could not act on those recommendations without speaking with you first and obtaining your authority to move forward with those recommendations. Under a non-discretionary model, you make the decisions whether to follow our recommendations to you.

ASGIM does not limit its recommendations and services to proprietary products or specific types of securities. The firm does not require an account minimum or have any requirements for retail clients to engage our services.

For more detailed information about our services, refer to our [Form 2A](#).

### ***QUESTIONS YOU SHOULD ASK THE 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?***

### WHAT FEES WILL I PAY?

#### **Description of Principal Fees and Costs**

For investment management services, ASGIM charges an asset under management fee. ASGIM charges a fee based in part upon the amount of assets being managed. The fee ASGIM charges for financial planning is hourly.

Since we are an investment adviser which charges an asset-based fee, the more assets there are in a retail investor’s advisory account, the more a retail investor will pay ASGIM in fees. ASGIM therefore has an incentive to encourage you to increase the assets in your account with us.

#### **Description of Other Fees and Costs**

Other fees charged to you are fees paid to a custodian and sub-adviser as well as other transactional fees and product-level fees. These fees can include brokerage commissions, transaction fees, custodial fees, wire transfer and electronic fund processing fees. Investment management fees, sub-advisory fees, and administrative fees can be charged by mutual funds and exchange traded funds contained within your investment portfolio.

#### **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.

The fees for investment advisory services are described in further detail in our firm’s [ADV](#), in particular, Item 5 A, B, C and D.

**QUESTIONS YOU SHOULD ASK THE 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 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.*

ASGIM is affiliated with an insurance agency, Accurate Solutions Group, LLC. ASGIM's financial professionals are licensed insurance agents of Accurate Solutions Group, LLC. The insurance agency and its insurance agents make money when clients purchase insurance products from them. Accurate Solutions Group, LLC accepts marketing support and economic benefit from third party insurance marketing organizations. ASGIM also accepts marketing reimbursement support and economic benefit from AssetMark, a third-party asset management platform. This compensation is disclosed more fully on our Form ADV 2A, Item 10.

It will benefit ASGIM to recommend that clients increase the assets in their accounts and make IRA rollovers from 401(k) plans to accounts managed by ASGIM. The more assets an ASGIM client's advisory account holds, the more ASGIM and its financial professionals are paid in fees. ASGIM has a financial incentive to encourage a client to increase the assets in his or her account with the firm.

**QUESTIONS YOU SHOULD ASK THE FINANCIAL PROFESSIONAL:**

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

For more detailed information regarding conflicts of interest, please see our [Form ADV 2A](#) brochure.

**HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

At ASGIM, each financial professional is paid a salary and benefits along with a percentage of assets under his management. Financial professionals can earn a discretionary bonus based on the overall production of new revenue at the firm level.

Our financial professionals receive compensation from the sales of securities and insurance products which is derived from the intake of fees from their clients.

It is possible that an ASGIM financial professional could have too many relationships to service them in accordance with our fiduciary duty to client. To mitigate that conflict, ASGIM manages its financial professionals' workloads to ensure that our clients receive service in accordance with ASGIM's fiduciary duty to our clients.

**DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?**

No. Please see [Investor.gov/CRS](http://Investor.gov/CRS) for a free search tool to research ASGIM and our financial professionals.

**QUESTIONS YOU SHOULD ASK THE FINANCIAL PROFESSIONAL:**

*As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

**OTHER INFORMATION**

You may find additional information about our firm on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Please call us at 724-287-4071 for information about our services and to request a copy of our relationship summary.

**QUESTIONS YOU SHOULD ASK THE FINANCIAL PROFESSIONAL:**

*Who is my primary contact person?*

*Is he or she a representative of an investment adviser?*

*Who can I talk to if I have concerns about how this person is treating me?*