Introduction

Atlas Brown, Inc. (<u>Atlasbrown.com</u>) is registered with the U.S. Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. There are free and simple tools available to research firms and financial professionals at <u>Investor.gov/CRS</u>. This site also provides educational materials about broker-dealers, investment advisers, and investing.

What Investment Services and Advice Can You Provide Me?

We offer investment advisory services to retail investors. These services include asset management and additional "Family Office Services" (which may include non-investment related matters). We offer personalized advice to assist you with a wide range of services including asset accumulation, allocation, preservation, growth and transfer. We invest your assets in accordance with your objectives and goals using individual debt and equity securities, options, mutual funds, and/or exchange traded funds. For 'accredited investors,' we can recommend private placements.

Our services include ongoing monitoring of your investment portfolio as part of our regular services and an annual (or more frequent) review of your investment goals and portfolio. Atlas Brown can manage your accounts with discretionary authority. This means that we will be authorized by you in our Investment Management Agreement to make investment selections for your accounts. We will buy and sell the securities we believe are best suited to meet your investment objectives using the funds in your accounts. In some or all instances, we can manage your accounts with limited discretionary authority. This means that we will be authorized by you to make investment recommendations for your accounts and will buy and sell recommended securities with your funds <u>only</u> after receiving your approval to do so. Atlas Brown does not limit its recommendations and investment services to proprietary products or specific types of securities. We do not have a minimum account requirement. For more detailed information about our services, refer to our *Form ADV 2A brochure*.

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?

What Fees Will I Pay?

Description of Principal Fees and Costs: Atlas Brown charges its retail clients fees based on a percentage of the value of their assets under management or, in some instances, fixed fees. These fees are assessed quarterly in advance. Since we are an investment adviser which charges an asset-based fee, the higher the market value of your advisory account, the more you will pay in fees, but the stated percentage remains the same. We, therefore, have an incentive to encourage retail investors to increase the asset value in their accounts.

Description of Other Fees and Costs: All fees paid to Atlas Brown are separate and distinct from the fees and expenses that may be charged by other parties related to your account such as fees paid to the custodian and broker, fees related to mutual funds, ETFs, transactional fees and product-level fees (for example, private placement fees).

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 pay. The fees for investment advisory services are described in further detail in Item 5 of our firm's <u>Form ADV 2A brochure</u>.

Conversation Starters: 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 with be invested for me?

Form CRS Relationship Summary

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. The following is an example to help you understand. When you are charged an asset-based fee, the more assets there are in your account, the more you will pay in fees. It will benefit Atlas Brown to recommend that a client increase the assets in his or her account and suggest IRA rollovers from 401(k) plans to accounts managed by us. We have entered into an agreement with our primary custodian, Fidelity. This agreement creates an incentive for Atlas Brown to recommend Fidelity to our investors. For more detailed information regarding conflicts of interest, please see our Form ADV 2A brochure.

Conversation Starters: Ask your Financial Professional:

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

How do your Financial Professionals Make Money?

Our financial professionals are paid a salary and non-cash compensation in the form of an employee benefits package. They can earn additional compensation based upon retaining existing client relationships and developing new client relationships for the firm. The market value of these relationships provides a means for the firm to measure an Advisor's success and reward his or her achievement.

The factors which affect how much our financial professionals are paid include the market value of client relationships they service and the resulting revenue received by the firm for financial advisory services conducted by the Advisor.

The firm collects and retains fee schedules applicable to each client as documented in their Investment Management Agreement. Client fees are not impacted by additional compensation paid to their Advisor; firm management determines Advisor compensation based upon internal policy.

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

No. Neither Atlas Brown nor any of its financial professionals have legal or disciplinary history.

Please see <u>Investor.gov/CRS</u> for a free search tool to research Atlas Brown and our financial professionals.

Conversation Starters: Ask your Financial Professional:

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

Additional Information

You may find additional information about Atlas Brown on the SEC's website at <u>adviserinfo.sec.gov</u>. Our telephone number is 502-271-2913. Please call us for up-to-date information about our firm and to request a copy of our relationship summary.

Conversation Starters: Ask your Financial Professional:

- 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?