

**FORM CRS – CLIENT RELATIONSHIP SUMMARY**

Date: June 30, 2020

Part 3 of Form ADV

Regulation Best Interest – Form CRS

**Introduction**

Papamarkou Wellner (the “*Firm*,” “*we*,” “*our*,” “*us*”) consists of Papamarkou Wellner Asset Management Incorporated (“*PWAMI*,” the “*adviser*”), a U.S. Securities and Exchange Commission (“*SEC*”) registered investment adviser,\* and its control affiliate, Papamarkou Wellner & Company, Inc. (“*PW&Co*,” the “*broker-dealer*”), an SEC registered, Financial Industry Regulatory Authority (“*FINRA*”) and Securities Investor Protection Corporation (“*SIPC*”) member broker-dealer. Each of these entities provide different services to retail investors, have different fee structures, and are governed by different rules and regulations. It is important for you to understand the differences.

Free and simple tools are available to research firms and financial professionals at: [www.Investor.gov/CRS](http://www.Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. You can also learn about us and our investment professionals at FINRA’s BrokerCheck at: <https://brokercheck.finra.org/>.

**“What investment services and advice can you provide to me?”**

Papamarkou Wellner can help you with your investments in a number of ways. You should carefully consider the types of accounts and services that are right for you. This Form CRS – Client Relationship Summary describes the various types of services Papamarkou Wellner can provide to you and how we charge fees.

**As your investment adviser**, PWAMI offers asset allocation and asset management services to you, its retail high net-worth advisory clients, in addition to Family Offices, Endowments, and Foundations. Asset allocation plans can include different forms of investments or investment managers involving equities, fixed income, and alternative investments, including hedge funds, private equity, and real estate.

The adviser also offers high-net worth retail investors discretionary separate account management services. The Firm’s portfolio managers research, select, and invest in high quality global equities with the long-term goal of capital appreciation coupled with dividend income. PWAMI also constructs customized balanced portfolios catering to specific requirements.

PWAMI is the investment manager to the PW Portfolio, LLC (“*PW Portfolio*,” the “*Fund*”) a multi-manager, multi-strategy private fund of funds, which is based upon the proprietary research conducted by the Firm’s analysts. The Fund is open to retail investors that meet its suitability requirements. PWAMI writes and distributes free of charge to its clients a monthly commentary on the economy, capital markets, and specific industries.

PWAMI monitors the performance of its client’s allocated assets, and, recommends modifications from time to time as may be appropriate to the individual client. More information about our investment advisory services is available in our Form ADV Part 2A Brochure, available at the [advisorinfo.sec.gov](http://advisorinfo.sec.gov) website.

**As your broker-dealer**, PW&Co provides (and may recommend to you) the opportunity to make investments into private placements and private equity offerings. Eligible retail customers may open and transact (or have a third-party investment manager transact) in regular, cash, margin, or IRA brokerage accounts introduced by PW&Co to its clearing firm or in accounts held directly by the issuer of the securities purchased (sometimes referred to as “direct-held accounts”). For IRAs, your investments will be held with the custodian of the IRA.

- ✓ Our brokers do not monitor or exercise discretionary authority over your investments. Our investment professionals may be able to review your securities holdings with you upon request.
- ✓ We do not have minimum requirements for retail investors. Certain Investments may have minimum income eligibility or minimum or maximum investment limits.
- ✓ The risk profiles of certain investments can vary to a large degree. Please take the opportunity to speak with one of our investment professionals for more information.

➤ **Conversation Starters**

*“How do you help me decide which investments to choose?” “Do you recommend investments?”*

*“Given my investment experience, should I choose and investment advisory service, a brokerage service, or both? How can I decide”*

*“What are your qualifications to advise me, your relevant experience, registrations, education, etc.?”*

*“How do your qualifications help me?”*

*“Please tell me about the risks of investing in private placements, private equity, options, or debt?”*

*“Are managed accounts or managed funds better for me?”*

**“What fees will I pay?”**

As **PWAMI’s investment advisory client**, you pay investment advisory fees to us based on the fee schedule agreed-upon in the investment advisory contract. Our Form ADV Part 2A Brochure, available at the [advisorinfo.sec.gov](http://advisorinfo.sec.gov) website, describes in detail the fees PWAMI would charge for either asset allocation services or separate account management. These fees are negotiable. PWAMI does not charge any fees to retail client accounts other than the investment advisory fee. You would, however, also pay fees to other investment managers or to the sponsors of private placement or private equity investments that you make. It is very important to understand the fees and costs of an investment prior to making an investment decision.

- ✓ You will pay fees and costs whether you make or lose money on your investments over time.
- ✓ In our separately managed accounts, we charge the advisory fee based upon the assets in the account. But other fees are also typically assessed separately against the assets in your account, such as transaction fees, administrative services, IRA and qualified retirement plan maintenance fees.
- ✓ Management and transaction fees are also costs of investing in underlying alternative asset manager, investment advisor, or other pooled investment vehicles.
- ✓ In the case of some investment managers, especially hedge fund managers, they may also charge a performance fee annually in addition to management fees. The management fee is typically called an expense ratio in a mutual fund and a management fee in a private fund.
- ✓ It is important to point out that the more assets there are in your advisory account, the more you will pay in fees. Accordingly, we have an incentive to encourage you to increase the amount of assets in your account. Our fee schedule is set up in order to reduce this effect by reducing the fee percentage as certain asset levels are reached.
- ✓ The proprietary PW Portfolio is open to retail investors that meet its suitability requirements. It charges its own fees and expenses as described in its offering memorandum.

As **PW&Co’s retail brokerage customer**,

- ✓ You would pay a transaction-based fee (a “*commission*”) every time you buy or sell an investment. The commission rate or amount you pay for a transaction varies depending upon the type of investment and the size of the transaction.
- ✓ In a brokerage account, retail customers are charged transactions fees, whether the trades are conducted by you or an investment manager managing your account. You are charged more as more trades are conducted. As a result, we have an incentive to encourage you to trade in your account. These fees reduce the performance of your overall account.
- ✓ Brokerage account customers are also charged interest on the margin loans they may take out in their accounts. PW&Co shares in that interest revenue with its clearing firm, which extends the loan. You are charged more as the margin loan increases. As a result, we have an incentive to encourage retail customers to maximize their margin balances.

➤ **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 providing recommendations as my broker/dealer or when acting as my investment adviser? How else does your firm make money, and what conflicts of interest do you have?”***

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***WHEN WE PROVIDE YOU WITH A RECOMMENDATION, 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 PWAMI provides to you or the recommendations PW&Co provides to you. Here are some examples to help you understand what this means.***

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- ✓ PWAMI provides separately managed account services for retail investors and is incentivized to encourage retail investors to allocate money to these accounts in order to make management fees.
- ✓ PWAMI manages the proprietary PW Portfolio fund, and as such is incentivized to encourage retail investors to allocate money to the Fund in order to make management fees.
- ✓ PWAMI acts as a solicitor for other investment advisers that the Firm’s analysts have identified as high performing, and receives cash referral fees pursuant to the Investment Advisers Act Rule 206(4)-3.
- ✓ If PWAMI receives a referral fee from an investment manager or portfolio manager based on the referral of a PWAMI advisory client to that investment manager or portfolio manager, PWAMI’s advisory fee for that client will be reduced by the amount of such referral fee to the extent that it does not exceed the Firm’s advisory fee.
- ✓ PW&Co has non-exclusive distribution agreements with several other managers of hedge funds, private equity firms, and traditional asset portfolios, under which PW&Co acts as placement agent for the funds and receives remuneration for placing investors in those funds. Any such compensation of PW&Co will be in addition to the advisory fees payable to an adviser or manager for investment advisory services.

Ask your broker to explain these potential conflicts to you.

➤ ***Conversation Starters***

***“What are your conflicts of interest and how might they affect me? How will you address them?”***

***“Do you or your financial professionals have legal or disciplinary history?”***

Papamarkou Wellner and its employees have not been involved in legal or disciplinary events, whether relating to the Firm’s operations or to past or present investment client relationships.

➤ ***Conversation Starter***

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

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Please visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) for free and simple tools available to research firms and financial professionals. You can also find our information at FINRA’s BrokerCheck (<https://brokercheck.finra.org/>).

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## Additional Information

*To receive a copy of our Client Relationship Summary (Form CRS) please visit the Firm's website at [www.papamarkou.com](http://www.papamarkou.com). For additional information about Papamarkou Wellner Asset Management Incorporated ("PWAMI"), an SEC registered investment adviser,\* and its control affiliate, Papamarkou Wellner & Company, Inc. ("PW&Co"), a Member: FINRA/SIPC broker dealer, and the investment opportunities each offers, ask your Papamarkou Wellner investment professional.*

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

*For further information, please contact:*

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\*Any reference to Papamarkou Wellner Asset Management Inc. being a registered investment adviser does not imply that the company or any of its management has achieved a certain level of skill or training