

# FORM CRS CUSTOMER RELATIONSHIP SUMMARY

June 30, 2020

#### Introduction

PTS Brokerage, LLC ("PTS") is registered with the Securities and Exchange Commission ("SEC") as a securities broker-dealer and with the State of New Jersey as an investment advisor and is a member of the Financial Industry Regulatory Authority ("FINRA"). 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 <a href="investor.gov/crs">investor.gov/crs</a>, which also provides educational materials about broker-dealers, investment advisors, and investing.

### What investment services and advice can you provide me?

PTS offers both brokerage and investment advisory services to retail investors.

#### **Brokerage Services**

Our brokerage services include, but are not limited to, buying and selling securities and insurance products, including fixed and variable annuities, mutual funds, life insurance, 529 plans, and retirement plan products.

Brokerage services are transacted directly with an investment sponsor, such as an investment or insurance company. Brokerage services that are conducted directly with an investment sponsor involve transactions between us and the sponsor, with your financial account and the assets inside held directly with the investment sponsor or its designated custodian.

One of our obligations to you when providing brokerage services is that we must act in your best interest and not place our interests ahead of yours when we recommend an investment or an investment strategy involving securities. Additionally, when we provide any service to you, we must treat you fairly and comply with a number of specific obligations. However, our interests can conflict with your interests. When we provide recommendations, we must eliminate, mitigate or inform you of these conflicts, depending on the nature of the conflict.

We do not monitor your portfolio or investments on an ongoing basis. We may voluntarily, and without any agreement with you, review the holdings in your account for the purposes of determining whether to provide you with a recommendation. This voluntary review is not considered to be "account monitoring," and does not create an implied agreement with you to monitor the account.

You will receive account statements directly from the investment sponsor. The frequency with which you receive statements and the party responsible for delivering statements depends on the investments selected.

PTS does not have any stated account or investment minimums, however, the direct investment sponsor may have fund and/or account minimums. For additional information on these minimums, ask your financial professional.

Our brokerage services cover a specific selection of investments, and other firms could provide a different range of investment choices, some of which might have different costs.

#### **Advisory Services**

Our advisory services may include, but are not limited to, discretionary and non-discretionary investment advisory services (including investment portfolio monitoring, financial counseling, review of accounts, and securities research), third-party advisory services, retirement plan consulting services and products, consulting services, and financial planning.

When providing advisory services, we are held to a fiduciary standard that covers our investment advisory relationship with you. As fiduciaries, investment advisors are required to act in the best interest of their clients and not place their own interests ahead of their clients. However, at times our interests can conflict with your interests. When we provide recommendations, we must eliminate, mitigate or inform you of these conflicts, depending on the nature of the conflict.

When you use us for advisory services, you will pay an ongoing asset-based fee for our services. As part of these services, we will offer you advice on a regular basis, discuss your investment and overall financial goals, design a strategy to help achieve those goals, and regularly monitor your account. When you use us for financial planning or consulting services, the fees will be agreed upon between you and your financial professional.

There are different types of advisory accounts you can choose. You can select an advisory account that allows us to buy and sell investments in your account without asking you in advance (a "discretionary account"), or we may give you advice and you decide what investments to buy and sell (a "non-discretionary account").

For our discretionary services, you give our firm or an investment manager the authority to buy and sell securities, either absolutely or subject to certain restrictions. There is a prohibition against exercising discretion in client accounts unless granted written authority to enter orders on your behalf. For these discretionary services, investment monitoring is offered as part of our standard services and is provided at least annually.

For our nondiscretionary services, you make the ultimate decision regarding the purchase and/or sale of investments. Investment advice may be provided regarding asset allocation, investment portfolio construction, investment selection, or other services as agreed upon by both parties, and there may be limitations on investment offerings.

The advisory services may also have account/investment minimums, which are further detailed in our firm's Form ADV Part 2A.

Our investment advice only covers investments that are allowed according to the terms of each advisory program, and other firms could provide advice on a wider range of choices, some of which might have lower costs.

#### **For Additional Information**

Visit <u>www.ptsbrokerage.com</u> or see PTS's Regulation Best Interest Disclosures, Form ADV, Part 2A brochure (Items 4 and 7) and other applicable documents.

**Conversation Starters** Ask your financial professional:

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?

Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay.

#### **Brokerage Services Fees**

For brokerage services, you are charged fees and costs on your transactions through PTS in the form of:

- Sales charges mutual fund type accounts typically pay a sales charge either out of the initial investment, or upon withdrawal, depending on the share class you choose. A portion of the sales charge is paid to your financial professional in the form of a commission.
- Portfolio Expenses mutual funds typically have internal portfolio expenses that are deducted from the share value.
- Annuity Fees annuities typically have surrender charges if withdrawn early. Variable annuities, specifically charge ongoing mortality and expense charges and other miscellaneous fees depending on the product and riders chosen.

You may be assessed other fees and costs not listed above, depending on the type of accounts and products you have and where your accounts and investments are held. These include, but are not limited to: custodian fees, account maintenance fees, fees related to mutual funds and variable annuities, and other transactional and product-level fees.

As stated above, fees associated with brokerage accounts vary. The amount you pay will depend, for example, on how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us.

#### **Advisory Services Fees**

For most advisory services, you will pay an ongoing recurring fee based on the value of cash and investments in your advisory account. The more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account.

The amount paid to PTS and your financial professional does not vary based on the type of investments we select on your behalf or recommend to you. The asset-based fee reduces the value of your account and will be deducted from your account.

There are asset-based fees for investment advice, but separate transaction fees. Some investments (such as mutual funds and exchange-traded funds) impose additional fees that will reduce the value of your investment over time. For financial planning, the fees will be agreed upon between you and your financial professional.

Some fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account.

For additional details on how fees are calculated, refer to your investment advisory agreement and the applicable disclosures specific to your advisory account.

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**

Visit <u>www.ptsbrokerage.com</u> or see PTS's Regulation Best Interest Disclosures, Form ADV, Part 2A brochure (Items 5 and 6) and other applicable documents.

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 will be invested for me?

# What are your legal obligations to me when providing recommendations as my brokerdealer or when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or act as your investment advisor, 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 recommendations and investment advice we provide you. Here are some examples to help you understand what this means.

As you work with your financial professional to determine the right investments and services to achieve your investment goals, you should understand how we are compensated. This is because various forms of compensation may create potential conflicts of interest, and it is important for you to evaluate potential conflicts of interest in making investment decisions.

Certain sources of compensation may be familiar to you because they are directly associated with your account type or investments. Other forms of compensation, however, may not be as familiar, because they do not directly affect the amount you pay. Below are several examples of ways we make money and the associated conflicts of interest.

Additionally, commissions or other compensation related to one financial service provider, product, investment, or service may be higher than commissions or other compensation related to a comparable provider, product, or service. Those higher rates of compensation could provide incentives to us (and our financial professionals) to recommend certain providers, products, or services over those with lower rates of compensation.

It is important to note that while we will take reasonable care in developing and making recommendations to you, securities involve risk, and you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please consult any available offering documents for any security we recommend for a discussion of risks associated with the product. We can provide those documents to you, or help you to find them.

#### **For Additional Information**

Visit <u>www.ptsbrokerage.com</u> or see PTS's Form ADV, Part 2A brochure, and other applicable documents.

**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 can offer various types of advisory and brokerage programs, platforms and services, and can earn more or less if a certain type of service, program or platform is recommended. They are also compensated in a variety of ways, and the compensation can be based on factors such as: the amount of client assets they service; the time and complexity required to meet a client's needs; the product sold (i.e., differential compensation); product sales commissions; or revenue we earn from the financial professional's advisory services or recommendations.

In their day-to-day businesses, it is not uncommon for our financial professionals to face decisions about whether a particular action or circumstance constitutes a conflict of interest. While many conflicts can be avoided, there are some conflicts that are unavoidable. Since our financial professionals are compensated for the services they provide, this presents an inherent conflict of interest.

Commission-based financial professionals are compensated solely through commissions. In contrast, fee-based financial professionals charge an asset-based or flat fee directly to their clients for their services. This fee can be structured in multiple ways, such as an hourly rate or a percentage of assets under management. Financial professionals that offer both brokerage and advisory services can be compensated as commission-based or fee-based depending on the type of product or service offered.

Our financial professionals may have conflicts of interest beyond those disclosed by us, and those financial professionals will disclose, when appropriate, any additional material conflicts of interest no later than the time of a recommendation.

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

As a firm, we do not have any legal or disciplinary events, but we have some financial professionals who do. Visit <u>investor.gov/crs</u> or <u>brokercheck.finra.org</u> for a free and simple search tool to research us and our financial professionals.

Conversation Starters Ask your financial professional:

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

#### **Additional Information**

For additional information about our services, please visit <u>investor.gov</u>, BrokerCheck (<u>brokercheck.finra.org</u>), our website (<u>www.ptsbrokerage.com</u>), and, if applicable, your account agreement. For additional information on advisory services, see our Form ADV brochure on IAPD, on <u>investor.gov</u>, or on our website (<u>www.ptsbrokerage.com/client-disclosures.7.htm</u>), and any brochure supplement your financial professional provides. Additionally, you can request up-to-date information and/or a written copy of Form CRS by calling PTS at (856) 802-9400.

To report a problem to the SEC, visit <u>investor.gov</u> or call the SEC's toll-free investor assistance line at (800) 732-0330. To report a problem to FINRA, call (301) 590-6500. If you have a problem with your investments, account or financial professional, contact us in writing at PTS Brokerage, LLC, 125C Gaither Drive, Mount Laurel, NJ 08054.

Conversation Starters Ask your financial professional:

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

Securities and investment advisory services are offered through PTS Brokerage, LLC, broker-dealer, registered investment advisor and member of FINRA and SIPC. PTS Brokerage, LLC is separately owned and other entities and/or marketing names, products or services referenced here are independent of PTS Brokerage, LLC.