

## Introduction

We are CWS Financial Advisors, LLC, an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage services and fees differ, and 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://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals' registration information are also publicly available on the [Investor.gov](https://www.investor.gov) website.

## Relationships & Services

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

**A:** We offer customized investment advisory and financial planning services to retail investors. We offer advice on a full suite of securities described in Item 8 of our Form ADV Part 2A ("**Disclosure Brochure**"), including equities, fixed income, mutual funds, Exchange Traded Funds (ETFs), and similar investments. Our services are generally provided on a discretionary basis, which means that we have the power to buy and sell securities for your account without your prior consent. This authority is usually unlimited and remains in effect until you revoke it. At your request, non-discretionary investment advice is provided, where we make investment recommendations to you and you decide whether to implement the recommendation. We do not give advice on any proprietary investment products.

We strive to conduct a full review of portfolios at least annually. We monitor accounts on a continuous basis and conduct ad hoc reviews as needed (for example, if you change your objectives or risk tolerance, upon significant market and economic events, or if we change our investment strategy).

We require a minimum household account size of \$500,000 in assets under management, which can be waived at the firm's discretion.

### Q: Given my financial situation, should I choose an investment advisory service? Why or why not?

**A:** Advisory services are usually appropriate when you have a portfolio of securities for which you require ongoing advice. Investors who maintain few securities holdings, are not inclined to make changes to their portfolio, and who do not need comprehensive financial advice/guidance are likely best suited for a traditional brokerage account with a FINRA-registered firm.

### Q: How will you choose investments to recommend to me?

**A:** We recommend investments based upon your individual circumstances, financial situation, expectation of current and future cash needs, investment objective, and risk tolerance. In addition, we attempt to identify those investments in which we expect to yield an acceptable level of return given the amount of risk you're willing to assume, taking into account the level of diversification and how different securities and asset classes may complement one another.

### Q: What is your relevant experience, including your licenses, education, and other qualifications?

**A:** Our financial advisors have been in the financial services industry for several years and maintain the Series 65 exam qualification. You can find information on any professional designations of your financial advisor in the Form ADV Part 2B ("**Brochure Supplement**") we provide you at the onset of the advisory relationship.

### Q: What do these qualifications mean?

**A:** These qualifications assure that our professionals have met specific regulatory exam requirements to conduct investment activities (e.g., Series 65). In addition, professional certifications such as the CFP® and CIMA® require successful passing of the certification exam as well as rigorous continuing education requirements.

## Fees, Costs, Conflicts & Standard of Conduct

### Q: What fees will I pay?

**A:** Our quarterly asset-based fee will typically include financial planning services at no additional charge. In an asset-based fee relationship, our fees will rise and fall with the value of the assets we manage for you. We are economically incented to recommend that you place more assets in your account to increase the value of your portfolio. Some investment strategies employed by CWS carry additional costs, such as the expense ratio of mutual funds, ETFs, and any manager fees charged in sub-advised or third-party managed accounts.

We provide substantially all of our services on a wrap basis, which means that any custodial transaction costs and our advisory fee are included in one asset-based wrap fee we charge you. Given the nature of CWS's low-turnover portfolio management style, these transaction costs absorbed by CWS are historically low, but can run up to \$10 per transaction for some mutual fund trades. This wrap arrangement creates a potential conflict of interest as there is an economic incentive for CWS to keep trading costs at a minimum. Please review Appendix I to our Disclosure Brochure for information regarding conflicts of interest.

In a non-wrap relationship, clients of CWS would pay transaction charges directly to the custodian at the custodian's pre-negotiated rates. In addition to advisory and transaction fees, there are additional fees such as postage and handling, transfer taxes, SEC fees for sales of securities, and similar fees. These additional fees are not material, but like advisory fees and custodian fees, they do have an adverse impact on the value of your portfolio over time. We also offer "financial planning only" engagements, and those fees can be charged at an hourly or fixed rate if agreed upon by you and the firm. Each client's fee rate is agreed upon in a signed client agreement at the onset of the advisory relationship. An electronic copy of this signed agreement can be requested from CWS at any time. You can find more information about our fees and costs under Item 5 of our Disclosure Brochure, available at [Investor.gov/CRS](https://www.investor.gov/CRS).

**Q: 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?**

**A:** The cost for our services is calculated as a percentage of the value of your portfolio we manage. Specifically, the fees are calculated quarterly in arrears based on the average daily balance of the account over the previous quarter. For example, a \$10,000 average daily balance with a fee of 1% would be charged \$25 per quarter for a total of \$100 per year. This assumes the \$10,000 held constant. Paying fees means that it will take longer for you to realize positive returns than if no fees were charged. In this example, if you generated a 3% return, your net return would be 2%.

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 before engaging in a relationship with CWS or any advisory firm.

**Q: 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?**

**A:** *When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts of interest. You should understand and ask us about these conflicts, because they can affect the investment advice we provide. Here is an example to help you understand what this means:*

We are paid based upon the value of the assets in your accounts. Therefore, we have a conflict in that it is to our advantage to encourage you to hold your assets with us.

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

**A:** Conflicts of interest are situations where we are in a position to derive personal benefit from advice given. We manage these conflicts through disclosures and employing supervision procedures to ensure our financial advisors are acting in your best interest. If a financial advisor has outside business activities, it will be disclosed in their Brochure Supplement. Please see Items 10, 11, and 14 of our Disclosure Brochure as well as your financial advisor's Brochure Supplement for additional information about conflicts of interest.

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

**A:** Our firm makes money solely from the fees charged to clients for our services. Our financial advisors are paid a percentage of the fees we collect from you. As a result, we are incentivized to recommend that you add additional assets to your account.

## Disciplinary History

**Q: Do you or your financial professionals have legal or disciplinary history?**

**A:** No. You can visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

## Additional Information

**Q: Who is my primary contact person?**

**A:** Your CWS financial advisor will be your primary point of contact. However, administrative requests may be handled by an administrative assistant or client service professional.

**Q: Is he or she a representative of an investment adviser or a broker-dealer?**

**A:** No, none of our investment professionals are registered with a broker-dealer. Our investment professionals are licensed with CWS Financial Advisors as investment adviser representatives.

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

**A:** In the event you have issues to be addressed, you may contact Mr. Cory Wietfeldt at 269-349-4600 or by email to [cory@cwafas.com](mailto:cory@cwafas.com).

**You can find additional information about our investment advisory services at [Investor.gov/CRS](https://www.investor.gov/CRS). You may also request a printed copy of this Client Relationship Summary by contacting us at 269-349-4600 or via email to [cory@cwafas.com](mailto:cory@cwafas.com).**