

**Darwin Advisors, LLC**  
**d/b/a: Darwin Wealth Management**  
**July 16, 2021**  
**FORM CRS**

Darwin Wealth Management is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

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

We offer the following investment advisory services to retail investors: **Portfolio Management Services, including Web-Based Portfolio Management Services; Selection of Other Advisers; Financial Planning Services; and Advisory Consulting Services.** Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A, Items 4, 5, 7, and 8 by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/166585>.

**Account Monitoring:** If you open an investment account with our firm, as part of our standard service we will monitor your investments on an ongoing basis and will conduct account reviews at least annually.

**Investment Authority:** We manage investment accounts on a **discretionary** basis whereby **we will decide** which investments to buy or sell for your account. We have discretion to select, retain or replace third-party managers to manage your accounts. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. In limited circumstances, we also offer **non-discretionary** investment management services whereby we will provide advice, but **you will ultimately decide** which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

**Investment Offerings:** We offer advice on the following types of investments or products: equity securities, corporate debt securities (other than commercial paper), certificates of deposit, municipal securities, mutual fund shares, exchange-traded funds (ETFs), United States government securities, options contracts on securities, and money market funds.

**Account Minimums and Requirements:** In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

**Key Questions to 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?**

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/166585>.

- **Asset Based Fees** - Payable monthly in arrears. However, certain legacy clients may have a different billing arrangement (i.e. quarterly in arrears), as provided in your advisory agreement.
- **Hourly Fees** - An estimate of the total time/cost will be determined at the start of the advisory relationship. We require that you pay 50% of the fee in advance and the remaining portion upon completion of the services rendered.
- **Fixed Fees** - We require that you pay 50% of the fee in advance and the remaining portion upon completion of the services rendered.
- **Selection of Other Advisers** - You will pay advisory fees charged by third party investment advisers, which are separate and in addition to our fees.
- **Additional Fees** - Clients participating in model strategies, will also be assessed a model fee. Clients will also pay additional fees and/or expenses associated with mutual funds and ETFs. Clients will also be responsible for paying the custodial/brokerage fees, account maintenance fees, and transaction charges.

Examples of the most common fees and costs applicable to our clients are:

- Custodian fees;

- Account maintenance fees;
- Fees related to mutual funds and exchange-traded funds;
- Transaction charges when purchasing or selling securities; and
- Other product-level fees associated with your investments

**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.**

**Key Questions to 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 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 some 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.

- **Third-Party Payments:** Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. Additionally, certain persons providing investment advice on behalf of our firm are also registered as investment adviser representatives ("IARs") with an affiliated registered investment adviser. These persons will earn compensation for providing separate advisory services through the affiliated adviser. These fees for advisory services are separate and in addition to our advisory fees. This practice presents a conflict of interest because these persons have a financial incentive to recommend the advisory services of the affiliate.
- **Asset Based Fees:** Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets.

To help you understand what conflicts exist, refer to our Form ADV Part 2A by clicking this link: <https://adviserinfo.sec.gov/firm/brochure/166585>.

**Key Questions to 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 servicing your account(s) are compensated by salary, but may also receive a bonus. Our financial professionals' compensation is based on the amount of client assets they service and the amount of revenue the financial professional generates for the firm through their services. Additionally, certain employees of our firm receive compensation for the establishment of new client relationships. This creates a conflict of interest because they have a financial incentive to refer clients to our firm.

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

Yes. These events are disclosed in either our Form ADV or the specific individual's Form U4. These documents can be found by going to [Investor.gov/CRS](http://Investor.gov/CRS).

**Key Questions to Ask Your Financial Professional**

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 727-524-1427 or click the link provided: <https://adviserinfo.sec.gov/firm/brochure/166585>.

**Key Questions to Ask Your Financial Professional**

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