

## Introduction

Penobscot Wealth Management d/b/a Penobscot Financial Advisors (“PFA”) is an Investment Adviser registered with the Securities and Exchange Commission (“SEC”). We feel it is important to for you to understand how advisory and brokerage services and fees differ in order to determine which service model is right for you.

There are free and simple tools available to research firms and financial professionals at [www.investor.gov/crs](http://www.investor.gov/crs), which also provides educational materials about investment advisers, broker-dealers, and investing.

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

As an investment adviser, PFA offers Investment Advisory services to retail investors for either a fixed fee or an ongoing asset-based fee based on the value of your account. Our advisory services include Financial Planning, and Wealth Management services. If we are providing asset management services to you, we will meet to establish goals, agree on a strategy and check periodically for changes in your financial situation. We will regularly and continuously monitor your investments as part of our standard services. Please refer to Item 4 of our Form ADV Part 2A for further information.

We manage accounts on a discretionary basis, which means we do not need to call you when buying or selling investments in your account. You will sign an investment management agreement and limited power of attorney giving us this authority. This agreement will remain in place until you or we terminate our relationship. Please refer to Item 16 of our Form ADV Part 2A for further information.

We do not limit our advice and services to proprietary products or a limited menu of products or investments.

We have no asset minimum. We do have a minimum annual fee ranging between \$3,900 to \$6,300 depending on household assets and complexity. Please refer to Item 7 of our Form ADV Part 2A for further information.

### Questions to Ask Us:

- *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 means?*

## What fees will I pay?

Fees and costs affect the value of your account over time and vary depending on certain factors. Please ask our team to give you personalized information on the fees and costs you will pay. Here is a description of our fees for each service model:

### Financial Planning Services:

We will charge a fixed annual rate between \$3,900 to \$6,100 annually based on your household assets, excluding primary residence. This fee can be charged monthly, quarterly, semi-annually or annually at your choosing. We do offer a discounted, limited-scope plan for University of Maine employees for a one-time fee of \$100. Please refer to Item 5 of our Form ADV Part 2A for further information.

### Wealth Management Services:

Wealth Management is the combination of Financial Planning and Investment Management services. We charge an ongoing fee based on the value of your account using the tiered schedule indicated below.

Assets Under Management	Wealth Management Wrap Annual Fee
\$0 - \$1,000,000	1.00%
\$1,000,000 - \$5,000,000	0.60%
\$5,000,000	0.40%

Our incentive is to increase the value of your account over time, which will increase our fees over time.

Fees associated with our wrap free program will include most transaction costs and fees to the broker-dealer (“custodian”) of your account, and as a result fees are normally higher than a typical asset-based advisory fee.

You could also pay fees charged by the custodian for certain investments and maintaining your account. Some investments, such as mutual funds and exchange traded funds charge additional fees that will reduce the value of your investments over time.

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. Please refer to Item 5 of our Form ADV Part 2A for further information.

*Question to Ask Us:*

- *Help me understand how these fees and costs might affect my investments. If I give you \$500,000 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.

PFA's revenue is generated by the advisory fees we collect from our clients' accounts each quarter. We have an incentive to increase the amount of investments we manage which could bias our advice towards investing more rather than paying off debt or recommending you not have investments that we do not manage. For a list of conflicts of interest, click here <https://reports.adviserinfo.sec.gov/reports/ADV/286211/PDF/286211.pdf>

*Question to Ask Us:*

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

How do your financial professionals make money?

Our Financial Advisors are employees of the firm and are paid a combination of fixed salary, quarterly variable performance-based compensation and an annual incentive based on firm success. The quarterly and annual compensation amounts are based on metrics such as production (new assets brought under management), and firm revenue and profitability. This compensation structure creates an incentive for our financial professionals to recommend that you increase the size of your account with us.

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

No, our firm and/or financial professionals do not have legal and/or disciplinary history. Visit [www.investor.gov/crs](http://www.investor.gov/crs) for a free and simple search tool to research our firm and our financial professionals.

*Questions to Ask Us:*

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

Additional Information

You can find additional information about our investment advisory services on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD# 286211. You may also contact our firm at 207-990-1901 or [info@penobscotfa.com](mailto:info@penobscotfa.com) to request a current copy of our Form ADV Part 2 or up-to-date Form ADV Part 3 – this relationship summary.

*Questions to Ask Us:*

- *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?*

## Summary of Material Changes

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- Since the last filing of this Form ADV Part 3, dated March 6, 2023, Financial Planning Fees section was updated from “household income” to “household assets, excluding primary residence” and fixed fee range has been updated to \$3,900 - \$6,300 annually. Additionally, we have updated disclosure regarding where to find additional information and conflicts of interest related to the compensation structure of our financial professionals.