

Willink Asset Management LLC
Customer Relationship Summary (Form CRS)
December 15, 2024

Introduction

Willink Asset Management LLC, hereinafter referred to as WAM, is an SEC-registered investment advisory firm that provides only fee-based investment advisory services to its clients. The Firm does not provide commission-based brokerage services. Investment advisory and brokerage services are different, and it is important that you understand these differences when selecting services appropriate to your specific needs. Information outlining the differences between these types of financial services are available to research firms and financial professionals at www.investor.gov/CRS which also provides to the public educational materials about broker/dealers, investment advisors and investing in general.

What Investment Services and Advice can you provide me?

We offer the following investment advisory services to retail clients: portfolio management (we implement/review your portfolio, investment strategy, risk tolerance and investments); personalized confidential financial planning (we review your financial situation and provide advice to meet your goals) and related consulting services. Recommendations to clients are made based on ongoing consultations with our clients and analysis of each client's specific financial needs.

As registered investment advisors, holding Certified Financial Planners® or Personal Financial Specialist^(PFS™) designations, we adhere to fiduciary standards which require that we put your interests above those of ourselves and our Firm. As part of our standard services, client accounts are monitored for performance and suitability on an ongoing basis and reviewed with each client, at least annually. Trading within client advisory accounts is conducted on a discretionary basis, as stipulated within our Firm's advisory agreement, which means client approval is not required in advance of trading activities. Discretionary authorization remains in place for the duration of our advisory relationship. WAM does not sponsor, endorse or promote proprietary products to its advisory clients opting, instead, to provide securities generally available on recognized markets. While WAM does not specify a minimum account size, it does require a minimum annual advisory fee, based on the several client-specific parameters (i.e. initial WAM engagement date, advisory account size), as specified in the Fees section of our Form ADV Part 2A Disclosure Document. More detailed information regarding the advisory services provided and actual fee structure payable to WAM for its advisory account management services may be found in the Form ADV Part 2A.

Conversation Starter. Ask your investment advisor –

- ***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?

As outlined in the Fees section of our Form ADV Part 2A, we are paid for our advisory services through either fixed dollar fees for financial planning/consulting services or through an asset management fee based on a percentage of assets under our management in your advisory accounts. While the former fees are fixed, with the latter, the dollar amount of our compensation is determined primarily by the date you engaged WAM's advisory services and the size of your portfolio. Long-term (legacy) clients of the Firm are afforded a lower minimum annual advisory fee than clients onboarded after March 2022. Beyond minimum annual fees, however, as the size of your managed portfolio increases so will the fees you pay us grow proportionately as well. Thus we have an incentive to increase those assets in order to increase our fees, which are payable to WAM even if you do not have any transactions. The management fees paid to us generally do not vary based on the type of investments selected. While we strive to use the most cost-effective investment choices, some investments (e.g. mutual funds, ETFs, etc.) impose additional fees (i.e. transactional fees such as ticket charges, product level expense ratios). There may also be transaction fees charged at the broker/dealer (custodian) level. 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.

Conversation Starter. Ask your investment advisor –

- ***Help me understand how these fees and costs might affect my investments. If I invest \$10,000 with you, 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 advisor? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, as fiduciaries 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 may potentially create some unintended conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.

Our main revenue source is client fees. As stated above, we have an incentive to increase the value of your investments we manage which potentially could bias our advice to you. We might be in favor of keeping money in your managed portfolio rather than recommending that you pay off debt or make investments that we do not manage. However, as fiduciaries, our advice will always be based on your best interests, an evaluation of current market conditions and your specific situation.

Conversation starter. Ask your investment advisor –

- ***How might your conflicts of interest affect me, and how will you address them? For additional information, please see our Form ADV Part 2A Disclosure Document.***

How do your financial professionals make money?

We are paid based on either a percentage of your assets under our management or through set fees for financial planning/consulting services, which are defined in our Form ADV Part 2A. Your individual advisor is paid a portion of these fees as his compensation and the remainder is compensation to our Firm. While the potential for a conflict of interest exists by your advisor or the Firm recommending one type of service over the other based on greater compensation, as Certified Financial Planners® and fiduciaries, we must put your interests above ours when determining which type of financial service best suits your needs and objectives.

Do your financial professionals have legal or disciplinary history?

No, as stated in our Form ADV Part 2A, no advisor associated with WAM has any legal or disciplinary histories. Clients may utilize www.investor.gov/CRS as a free and simple search tool to seek additional information on WAM or its advisors.

Conversation starter. Ask your investment advisor –

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

Additional Information

For additional information about our Firm and its services, please refer to our complete Form ADV Part 2A Disclosure Document. Additional information regarding our individual investment advisors is available on their Form ADV Part 2B or through the SEC at www.adviserinfo.sec.gov. If you would like to receive a complete copy of our Form ADV, please contact Fred Fadel at (716) 687-0648 or by email at fredfadel@willinkadvisor.com.

Conversation starter. Ask your investment advisor –

- ***Who is my primary contact person? Is she/he a representative of your advisory firm? Who can I talk to if I have concerns about how this person is treating me?***