



December 24, 2024

Winlo Management Group Client Relationship Summary (CRS)

Introduction

Winlo Management Group, LLC ("WMG") is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of FINRA and the SIPC. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences.

Free and simple tools are available for you to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Relationships and Services

What investment services and advice can you provide me?

WMG limits its brokerage services predominantly to recommending and placing non-U.S. Citizens into qualifying offerings of the [EB-5 Immigration Investor Program \(EB-5\)](#). EB-5 offerings are private placements, unregistered, and classified as securities under SEC Regulation S and Regulation D. The minimum investment amounts for EB-5 offerings are established by the U.S. Citizenship and Immigration Services (USCIS). WMG must abide by the minimums established by the USCIS when placing investors in available offerings. WMG does not issue securities, provide investment advisory services to retail investors, nor does WMG monitor retail investors' investments.

Key Questions to Ask Your Financial Professional

- ✓ **Given my financial situation, should I choose a brokerage 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?**

Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Fees assessed on an EB-5 offering are established by the Issuer and typically range between .05% and 1.0% of the invested amount. A Private Placement Memorandum (PPM) is developed with details of the offering, including fees associated with the offering. You should review the PPM carefully for a full understanding of all fees and costs associated with any offering. As compensation for our services, WMG typically receives a flat placement fee for placing you in a qualifying offering. Other costs associated with EB-5 offerings include established USCIS filing and application fees.

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 Question 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 providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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 we provide you.

For example, we may be able to place you into competing EB-5 offerings of which one may offer a higher placement fee. This creates a conflict as we would receive higher compensation when placing you in an offering with a higher placement fee.

Key Question 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 are compensated if you make an investment in an EB-5 offering. The placement fee, typically determined by the issuer, is a percentage of the placement fee that is paid to your financial professional with the remainder of the fee retained by WMG.

Disciplinary History

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

Yes, please visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research WMG and our financial professionals.

Key Questions to 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 or to request an up to date copy of the relationship summary, please call us at 800.688.3824, email us at info@winlogroup.com, or by reviewing our [Form CRS](#) online.

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?**