

Introduction

Modum Asset Management LLC (“Modum”, “we”, or “us”) is registered with the Securities and Exchange Commission (the “SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors.

Investment Management Service: Under the Investment Management Service, Modum acts as a discretionary investment adviser by making all investment decisions regarding the assets placed under its discretion. Modum has full power to supervise and direct, in its sole discretion, and without first consulting the client, the purchase, sale, and holding of assets in the client account in securities, cash, and cash equivalents.

Advisory & Reporting Service: Under the Advisory & Reporting Service, Modum acts as a non-discretionary investment adviser to the client account. Modum may not, without prior consultation with the client, select, buy, sell, and trade in stocks, bonds, mutual funds, and other securities and/or contracts relating to the same in each case at the client’s risk for the client account. The client is free at all times to accept or reject any investment recommendations from Modum.

We monitor client portfolios on an on-going basis and make adjustments consistent with their investment objectives and goals. We offer advice with respect to various products and types of investments. You may place reasonable restrictions on the types of investments that may be purchased or sold in your account so long as the restrictions are explicitly set forth. We have a preferred minimum account size of \$1,000,000. We may consider clients with less than this minimum at our discretion.

Additional information: for additional information, please see Item 4 and Item 7 of our disclosure brochure, Form ADV Part 2A, a copy of which you should have received.

Conversation starters. 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?

Clients pay Modum, quarterly in arrears, an asset-based fee equal to a percentage per annum of the client account balance. For more detailed information about the fees you will pay, please refer to Item 5 of our disclosure brochure, Form ADV Part 2A, a copy of which you should have received.

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. You may pay fees and costs separate from our services, and regardless of whether you make or lose money on your investments. These additional fees and charges may include transaction and execution charges and the fees/expenses charged by any custodian, and other transaction-related costs, electronic fund and wire fees, and any other fees that reasonably may be borne by a brokerage account. You will pay a margin interest percentage to our broker-dealer if you opt-in to margin services.

Conversation starters. 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 is one example to help you understand what this means:

- Our asset-based fee structure gives us the incentive to encourage clients to increase their account balance.

Additional information: for additional information about our personal trading procedures and code of ethics for our financial professionals, please see Item 11 of our disclosure brochure, Form ADV Part 2A, a copy of which you should have received.

Conversation starters. 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 paid cash compensation as salary based on their experience.

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

No. Visit investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation starters. Ask your financial professional:

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

Additional Information

If you would like additional, up-to-date information or a copy of this disclosure, please call (332) 223-4025 or email contact@modumam.com

Conversation starters. 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?*