

Gunn & Company Investment Management, Inc.
Form CRS Customer Relationship Summary
March 26, 2024

Introduction	<p><i>Gunn & Company Investment Management, Inc. (“GCIM”) is registered with the US Securities and Exchange Commission (“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.</i></p>
What investment services and advice can you provide me?	<p>We offer investment advisory services to retail investors. We participate in the CPAlliance™ program, which allows CPS Investment Advisors (“CPS”), who acts as a sub-advisor, to provide certain investment advisory services for GCIM clients. CPS services to GCIM clients include, but are not limited to, investment supervisory services, 401(k) services, and cash management services. GCIM in turn maintains the retail investor relationship. At the initial review of a client's portfolio, GCIM, through CPS, may give advice on all investments owned by the client. Information gathered as part of the investment advisory process includes, but is not limited to, a client's current financial status, future goals and attitudes towards risk. GCIM and CPS provide ongoing monitoring of retail investors’ accounts as part of their regular service. GCIM accepts discretionary authority over client accounts, as granted in the investment advisory agreement, as well as offers non-discretionary services, which requires the client to provide the ultimate decision regarding the purchase or sale of investments. GCIM does not offer proprietary products, but its offerings are limited to the menu of investments offered by CPS. GCIM does not require clients to maintain a minimum account size.</p> <p><i>For additional information, please see our Form ADV Part 2A, Items 4, and 7. This form can be found at https://adviserinfo.sec.gov.</i></p> <p><i><u>Conversation Starters. Ask your financial professional—</u></i></p> <ul style="list-style-type: none"> • <i><u>Given my financial situation, should I choose an investment advisory service? Why or why not?</u></i> • <i><u>How will you choose investments to recommend to me?</u></i> • <i><u>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</u></i>
What fees will I pay?	<p>Investment services fees are calculated based upon a percentage of assets under management. Fees generally range from 0.750% to 1.500% and include the portion of fees paid to CPS for their sub-advisory services. GCIM will generally bill its fees in advance on a quarterly basis. This presents a conflict of interest in that the more assets there are in a retail investor’s investment advisory account, the more a retail investor will pay in fees, and GCIM may therefore have an incentive to encourage the retail investor to increase the assets in his or her account. Fees paid to GCIM are exclusively for investment advisory services. Clients may incur certain other charges imposed by broker-dealers, custodians, and other third parties. Those fees may include, but are not limited to, transaction fees, custodial fees, short-term redemption fees, mark-ups/mark-downs, dealer spreads, wire-transfer fees, electronic fund fees, and taxes or other costs associated with the account, among other things. Mutual funds, exchange-traded funds (“ETF”)s and other investment company securities also charge internal management fees. Additionally, a third-party administrator is hired by CPS to perform accounting and document preparation functions.</p> <p><i>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.</i></p> <p><i>For additional information, please see our Form ADV Part 2A, Item 5. This form can be found at https://adviserinfo.sec.gov.</i></p> <p><i><u>Conversation Starter. Ask your financial professional—</u></i></p> <ul style="list-style-type: none"> • <i><u>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?</u></i>

<p>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?</p>	<p><i>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 recommendations we provide you. Here are some examples to help you understand what this means.</i></p> <p>GCIM's sole income is acquired through assets under management from the retail investors' accounts. This presents a conflict of interest in that the more assets there are in a retail investor's investment advisory account, the more a retail investor will pay in fees, and GCIM may therefore have an incentive to encourage the retail investor to increase the assets in his or her account. Additionally, GCIM does have access to free or discounted research materials from broker-dealers and/or third-party providers in exchange for having assets custodied at Fidelity Investments. GCIM acknowledges that it is a fiduciary under ERISA and the Internal Revenue Code.</p> <p><i>For additional information, please see our Form ADV Part 2A, Item 14. This form can be found at https://adviserinfo.sec.gov.</i></p> <p><u>Conversation Starter. Ask your financial professional—</u></p> <ul style="list-style-type: none"> • <u>How might your conflicts of interest affect me, and how will you address them?</u>
<p>How do your Financial professionals make money?</p>	<p>GCIM financial professionals' compensation is based upon the income generated by the firm, specifically the income generated from clients those professionals are responsible for servicing. This presents a conflict of interest in that the more assets there are in a retail investor's investment advisory account, the more a retail investor will pay in fees, and GCIM may therefore have an incentive to encourage the retail investor to increase the assets in his or her account.</p>
<p>Do you or your financial professionals have legal or disciplinary history?</p>	<p>Yes. Our firm does not, but our financial professionals do.</p> <p>Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p><u>Conversation Starter. Ask your financial professional—</u></p> <p><u>As a financial professional, do you have any disciplinary history? For what type of conduct?</u></p>
<p>Additional Information</p>	<p><i>If you would like additional, up-to-date information about our investment advisory services, or a copy of this relationship summary, please contact Susan Hughes at 904- 296-2025 ext.804 or by email at shughes@gunncocpas.com.</i></p> <p><u>Conversation Starter. Ask your financial professional—</u></p> <ul style="list-style-type: none"> • <u>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?</u>