

**Walter C. Flower & Co., Inc.**  
**Form CRS**  
**March 1, 2024**

**Introduction**

Walter C. Flower & Co., Inc. is registered with the 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 [Investors.gov/CRS](https://www.investors.gov/CRS), which also provides educational materials about broker/dealer, investment advisers and investing.

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

We offer investment advice and portfolio management services for retail investors on both a discretionary and a non-discretionary basis. A discretionary account allows us to buy and sell investments in your account without asking for your approval in advance. A non-discretionary account means that you decide what investments to buy and sell. Although we do not have a minimum account size, we charge an annual minimum fee of \$5,000. Negotiable in limited circumstances, we generally discourage accounts less than \$500,000. As part of your portfolio management services, we will monitor your investments on an ongoing basis. We do not limit the types of investments that we recommend.

*For additional information*, please see our Form ADV Part 2A, Items 4,7,13 and 16.

**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 license, education and other qualifications mean?**

**What fees will I pay?**

Our fees are computed as a percentage of assets managed. We charge 1% on the first \$100,000, and then 0.50% on the amount between \$100,000 and \$10,000,000, and then 0.40% on the amount above \$10,000,000. The minimum fee is \$5,000 annually. Fees are negotiable in limited circumstances. We do not charge performance based fees. The more assets there are in your account, the more you will pay in fees, so we have an incentive to encourage you to increase the assets in your account. Clients may pay other expenses in addition to the fees paid to us. For example, clients may pay costs such as brokerage commissions, transaction fees, custodial fees, transfer fees, wire transfer fees, and other fees and taxes charged to brokerage accounts and securities transactions, which are unrelated to the fees collected by us. Mutual funds and other pooled investment vehicles also charge internal management fees, which are disclosed in the vehicle's offering documents.

**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.**

*For additional information*, please see our Form ADV Part 2A brochure Items 5 & 6.

**Conversation starter.** 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 out 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 affect the recommendations we provide you. Here is an example to help you understand what this means.**

- **Custodian - We may recommend that you engage a particular custodian from whom we receive support services. This presents a conflict of interest because our receipt of their support makes us more inclined to continue using and recommending them.**

**Conversation starter.** Ask your financial professional:

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

*For additional information*, please see our Form ADV Part 2A.

**How do your financial professionals make money?**

All of our financial professionals are compensated entirely by the profitability of Walter C. Flower & Co., Inc.

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

**No.** Visit [Investor.gov/CRS](http://Investor.gov/CRS) for free search tools to research us and our financial professionals.

**Conversation starter.** Ask your financial professional:

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

**Additional Information.**

*For additional information about our services or to request a copy of Form CRS, please contact us at:*

Walter C. Flower & Co., Inc.  
722 Constantinople St.  
New Orleans, LA 70115  
Tel.: 504-561-0138  
Email: [waltercflowerco@gmail.com](mailto:waltercflowerco@gmail.com)

**Conversation starter.** Ask your financial professional:

- **Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?**

