

## PATHWAYS WEALTH MANAGEMENT, INC.

June 25, 2024

### Item 1. Introduction.

PATHWAYS WEALTH MANAGEMENT, INC. is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers and investing.

### Item 2: What investment services and advice can you provide to me?

Pathways Wealth Management provides investment advisory services to retail investors. The principal service we offer is investment management services. In providing investment management services we may also provide financial planning. In addition, we provide financial planning services on a standalone basis. Previously, while state registered, we provided investment management services to clients through a wrap fee program and the provision of investment management services through a wrap fee program is limited to those clients. We tailor your investment management services to match the investment objectives, goals, risk parameters, financial and other information which you provide to us. We monitor the holdings and performance of your account on an ongoing basis. However, if we provide you with financial planning only services, after delivery of the completed financial plan to you, we do not engage in any ongoing review or services, unless you engage us to provide investment management services. We provide investment management services on a discretionary basis pursuant to authority granted to us in your client agreement. Pursuant to this discretionary authority we are authorized to determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which transactions will be effected. However, there are clients for which we provide investment management services on a non-discretionary basis. In addition, we generally do not limit the types of investments we utilize for clients, but consistently utilize exchange traded equity securities, registered mutual funds and exchange traded funds, but we will also invest in US government/agency bonds, corporate bonds, and certificates of deposit. We do not impose account minimums for new clients. Regardless, we reserve the right to accept or decline a potential client for any reason in our sole discretion. For additional information, please refer to our [Form ADV Part 2A Brochure](#), [Item 4 Advisory Business](#) and [Item 7 Types of Clients](#) and [Item 4.A Services Fees and Compensation](#) and [Item 5 Account Requirements and Types of Clients](#) in our [Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure](#).

#### Questions to Ask Us:

*Given my financial situation, should I choose an investment advisory service? Why or why not?*

*How will you choose the investments that you recommend to me?*

*What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### Item 3 (part 1): What fees will I pay?

For investment advisory services we charge an asset-based fee, which is billed on a quarterly basis. For an asset-based fee, the more assets that are in a client's advisory account, the more a client will pay in fees. Therefore, we may have an incentive to encourage clients to increase the assets in his or her account. Previous clients while we were state registered pay an asset-based wrap program fee. Asset based wrap program fees will include most transaction costs and fees to a broker-dealer or bank that has custody of the client's assets, and therefore are often higher than a typical asset-based advisory fee. For financial planning services we charge a fixed or hourly fee, which is billed periodically or at the completion of the engagement as per our agreement with you.

For our clients not participating in the wrap fee program, in addition to our fees you will be responsible for other fees and expenses, such as, transaction charges and fees/expenses charged by any custodian of your account, subadvisor, mutual fund, exchange traded fund, separate account manager and any taxes or fees required by federal or state law. For previous clients participating in our asset-based wrap program fee you will be responsible for other fees and expenses, such as fees/expenses charged by any mutual fund, exchange traded fund, and any taxes or fees required by federal or state law, as well as commission and transaction fees for any transactions executed away from the program broker-dealer. 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, see [Item 5 Fees and Compensation](#) of our [Form ADV Part 2A Brochure](#) and see [Item 4 Services, Fees and Compensation](#) of our [Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure](#).

**Question to Ask Us:**

*Help me to 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?*

**Item 3 (part 2): 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 conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. As an example, we receive various benefits and services from custodians that we may recommend to you. For additional information, please refer to our [Form ADV Part 2A Brochure](#), [Item 12 Brokerage Practices](#) and [Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure](#), specifically, [Item 9 Additional Information](#).

**Question to Ask Us:**

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

**Item 3 (part 3): How do your financial professionals make money?**

Our financial professionals are paid pursuant to participation in firm profits as owners of the firm. Financial professionals paid pursuant to their ownership in the firm are subject to a conflict of interest due to the fact increases in firm or client account revenue and increases in managed client assets may lead to increased firm profits. Certain of our financial professionals serve as registered representatives of unaffiliated broker-dealers. These financial professionals earn commissions and other fees on products sold through the unaffiliated broker-dealer. While no commissions are earned by these financial professionals relative to any of our client investment advisory services accounts, this presents a conflict of interest because these financial professionals in their role as registered representatives for the unaffiliated broker-dealer are incentivized to make recommendations based on the compensation received rather than on a client's needs. For additional information regarding our financial professionals' activities as registered representatives of an unaffiliated broker-dealer please refer to our [Form ADV Part 2A Brochure](#), [Item 10 Other Financial Industry Activities and Affiliations](#) and [Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure](#), specifically, [Item 9 Additional Information](#).

**Item 4: Do you or your financial professionals have a legal or disciplinary history?**

No. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Questions to Ask Us:**

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

**Item 5: Additional Information**

For additional information about our investment advisory services and to request a copy of our Form CRS, please contact 937-552-7307.

**Questions to Ask Us:**

*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 a person is treating me?*