

About Form CRS

In June 2019, the Securities and Exchange Commission (SEC) adopted requirements for registered investment advisers, broker-dealers, and dual-registrants to file Form CRS (Customer Relationship Summary) with the commission and provide Form CRS to retail investors.

What is the Form CRS intended to inform retail investors about?

- The types of client/customer relationships and services the JVM offers;
 - Fees, costs, conflicts of interest, and required standard of conduct associated with those relationships and services;
 - Whether JVM and/or our financial professionals currently have reportable legal or disciplinary history;
 - How to obtain additional information about JVM Securities and JVM Capital.
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- For investment advisers, Form CRS is known as Part 3 of Form ADV.
 - Form CRS is an additional disclosure requirement. It does not eliminate any existing disclosures.
 - Form CRS may be delivered as part of a disclosure packet, but it must be the first document. For example, some investment advisers are considering a disclosure packet approach to include Form ADV Part 2B disclosure supplements.
 - Dual registrants may have particular challenges. For example, if the firm is a dual registrant, but the financial professional engaging with the retail investor is qualified only as a registered representative, it must be made clear in the relationship

When must the Form CRS be delivered?

JVM Capital Investment Advisers must send Form CRS to clients and prospective clients before or at the time they enter into an investment advisory contract with the retail investor. This includes oral agreements.

JVM Securities' Registered Representatives must send Form CRS to clients and prospective clients before a recommendation of account type, securities transaction, or a

recommendation of investment strategy involving securities is made or before placing an order for a retail investor, whichever is earliest.

What are the compliance and record keeping requirements related to Form CRS?

- **JVM Capital Investment Advisers** must retain a record of the dates that each relationship summary and any amendments or revisions were given to any client or prospective client who subsequently becomes a client. These records must be retained for a minimum of five years.*
- **JVM Securities' Registered Representatives** must retain a record of the date each relationship summary was provided to each retail investor, including any summary provided before the retail investor opens an account. Records must be maintained for a minimum of six years after the relationship summary is created.*
- JVM monitors the delivery of... by... Each above section, let them know how JVM documents this process. JVM cap and securities.

Once the Form CRS is delivered to the client initially, will I need to deliver it again in the future?

- If there is a material change to the Form CRS, an updated copy must be delivered to the client within 60 days. You will be notified should this occur.
- any time the firm opens a new account that is different from the client's existing account(s).
- when the firm recommends that the client roll over assets from a retirement account into a new or existing account or investment.
- when the firm recommends or provides a new investment advisory service or investment that does not necessarily involve the opening of a new account and would not be held in an existing account.

Can the Form CRS be delivered electronically?

- Yes, but you must have prior consent from the client.

For additional information, or with questions, please contact Jake Palmer, Chief Compliance Officer, at jake.palmer@jvmrealty.com.