



# Investnet Asset Management, Inc.

(d/b/a Investnet Capital Management)

## Form CRS

September 3, 2024

### Introduction

Investnet Asset Management, Inc. (Investnet) is registered with the Securities and Exchange Commission as an investment adviser. Fees for brokerage and investment advisory services differ among broker-dealers and investment advisers and it is important that you 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.

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

We offer investment advisory services to retail investors who are working with an independent investment advisor representative (Advisor), including discretionary portfolio management, investment research and administrative and technology support and financial planning tools. Collectively, these services are offered as various investment programs (Programs) which may include the investment strategies of other asset managers retained by us. In general, your Advisor engages us as a sub-advisor. Working with you, your Advisor determines a recommended investment strategy and directs us as to the implementation of that strategy. We manage your assets on a discretionary basis and monitor the adherence of your assets to the selected strategy. Many of our programs are offered as wrap programs where you pay one fee for the securities trading and custody services. We require a minimum initial account size for portfolio management services, which may be subject to negotiation. Our investment advice is not limited to proprietary products or to a limited menu of products or types of investments.

Please refer to our [Form ADV, Part 2A Brochure](#) for more detailed information about our services.

You are encouraged to ask us questions, including the following, to help you better understand our services: *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?

We charge you an asset-based program fee (Program Fee). The Program Fee consists of the asset management services fee, portions of which may be paid to a third-party asset manager, and a platform fee for our technology and administration services. If you are participating in a wrap program, the Program Fee will also include a fee for the securities trading and custody services. In certain cases, the Program Fee may be a fixed fee or have a fixed minimum fee if your assets fall below a certain threshold. If you are invested in one of our proprietary exchange traded funds (ActivePassive ETFs™) the ActivePassive ETFs™ pay us an advisory fee. Because our Program Fees are usually based on a percentage of your assets, we have an incentive to encourage you to increase the assets in your account. Investnet's fee does not include the fee charged by your Advisor, but we often perform the fee billing service on your Advisor's behalf. Our fees are generally charged quarterly or monthly in advance, but we support billing in arrears if selected by your Advisor.

In addition to our fees, you may incur additional fees and costs related to the investments in your account, such as custodian fees, account maintenance fees, transaction costs, surrender charges, wire transfer and electronic fund fees, internal management fees of mutual funds and variable annuities, and other product related fees such as redemption fees.

**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. Please refer to our [Form ADV, Part 2A Brochure](#), particularly Item 5, for more detailed information about our fees and your investment costs.**

You are encouraged to ask us questions including the following to help you better understand the impact of fees and costs on investments: *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 are some examples to help you understand what this means.

- We offer our proprietary investment strategies (Envestnet Strategies, often referred to as a “PMC” strategy) and ActivePassive ETFs™ in the Programs. Use of the Envestnet Strategies increases the percentage of the Program Fee we keep when these are selected.
- We automatically list our proprietary investment strategies and funds as “approved” on our Program offering but are conflicted in providing investment research and due diligence on the Envestnet Strategies and ActivePassive ETFs™.
- We retain a different percentage of the Program Fee depending on which asset manager your Advisor recommends. Envestnet acts as an endorser of certain asset managers participating in its Premier Partnership Program, for which we are compensated.
- Envestnet has a number of affiliations and investments with other financial services firms, which may provide investment services used in the Programs. Such affiliation(s) create a financial incentive for Envestnet to promote the use of these services.

We are fiduciaries to you. That means we are required to act in your best interest throughout our entire advisory relationship.

Please refer to our [Form ADV, Part 2A Brochure](#) for more detailed information about our conflicts of interest.

You are encouraged to ask us questions including the following to help you better understand our conflicts of interest: *How might your conflicts of interest affect me, and how will you address them?*

## How do your financial professionals make money?

Our financial professionals receive a salary and a discretionary bonus based on their individual performance and the success of the firm. Our financial professionals are also compensated based on the revenue we receive from investments issued, managed, or sponsored by us or an affiliate. This is a conflict of interest because our financial professionals have a financial incentive to recommend our own proprietary products or strategies over those that are offered by unaffiliated asset managers on the platform.

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

No, please visit [investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and your financial professional.

You are encouraged to ask us questions including the following to help you better understand our disciplinary history: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

## Additional Information

You can find additional information about our services in our [Form ADV, Part 2A Brochure \(envestnet.com/forms-adv-crs\)](#). You may request updated information and a copy of our Relationship Summary by contacting us at 312-827-2800.

You are encouraged to ask us questions including the following to help you better understand who to contact with any questions or complaints: *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?*