

INTRODUCTION

Our firm, Gordon Asset Management, LLC (“GAMLLC” or the “Firm”) is an investment advisor registered with the Securities and Exchange Commission. 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 www.investor.gov/CRS, which also provides educational materials about investment advisors, broker-dealers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer investment advisory services to retail investors in the form of asset management, financial planning and pension consulting.

Asset (Portfolio) Management: Our firm provides continuous advice to our clients regarding the discretionary and non-discretionary investment management of client funds based on the individual needs of the client. Through personal discussions and questionnaires designed to assess a client’s risk using qualitative and quantitative questions relating to behavior aversion to risk, timeline to and through retirement and the amount of current and projected assets, goals and objectives based on a client’s circumstances are established. We develop a client’s personal Investment Policy Statement (IPS), which formalizes the investment policy for all the accounts under management and create and manage a portfolio based on that policy.

In addition to custom constructed portfolios, GAMLLC also offers automated investment advisory services. These portfolios are typically deployed in conjunction with automated investing platforms. GAMLLC may also direct clients to third-party investment advisers to manage all or a portion of the client’s assets. Before selecting other advisers for clients, GAMLLC will always ensure those other advisers are properly licensed or registered as an investment adviser. GAMLLC conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser’s performance and investment strategy.

Financial Planning: Our planning services include preparing an analysis, recommended actions, and implementation assistance. Planning includes an evaluation of the investment and financial options available based upon your defined economic criteria and financial goals. We address the following in planning: (i) attempting to make optimal decisions; (ii) projecting the consequences of decisions in the form of a financial plan; (iii) implementing the protocol to achieve the objectives of the plan; and (iv) comparing future performance against the plan.

Additional information about our advisory services is located in Item 4 of our Firm Brochure which is available online at <https://adviserinfo.sec.gov/firm/summary/118471>.

Pension Consulting Services: GAMLLC provides pension consulting services separately or in combination with our other services. While the primary Clients for these services will be pension, profit-sharing, 403(b), and 401(k) plans, GAMLLC also offers similar services, where appropriate, to individuals, trusts, estates, and charitable organizations. GAMLLC may serve as a plan fiduciary as described by ERISA § 3(38) and/or 3(21)A(ii). These services may be provided on a discretionary or non-discretionary basis. We monitor accounts on an ongoing basis, and review at least annually with the client.

Conversation Starters:

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 those qualifications mean?

WHAT FEES WILL I PAY?

Asset (Portfolio) Management:

We provide our investment advisory services on a fee basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our “AUM Fee”). Our annual AUM Fee is negotiable, but generally ranges from 0.40% to 1.00% for discretionary clients and 0.40% to 1.25% for non-discretionary clients. Our automated investment program fees are 0.75% of managed assets. We typically do not require a minimum asset level to provide investment management services, but we do apply a minimum fee of \$5,000. Thus, certain smaller clients may pay more than 1.00%. We typically deduct our AUM Fee from one or more of your accounts, in advance, on a quarterly basis based upon value of the asset on the last business day of the previous quarter. Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage.

Financial Planning: Wealth planning fees are based on the size, complexity, and nature of your personal and financial situation and the amount of time it will take to analyze and summarize the plan. Wealth planning services are offered on a fixed fee basis. Fees range from \$1,000 to \$5,000 for the initial engagement.

Pension Consulting Services: Clients in our consulting program are billed \$150 to \$400 per hour, with a minimum fee of \$1,000.

Other Fees: The advisory fees and transaction charges do not cover charges imposed by third parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund or third-party investment manager charges

asset management fees, which are separate from, and in addition to, the Firm's advisory fees. The fees charged by such funds or managers are disclosed in each fund's prospectus or TPAM's ADV Part 2A. Third parties may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable Investment Management Agreement. GAMLLC's advisory fee also does not cover fees and charges in connection with debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law. In certain cases, we may select third party asset managers to manage your account. If selected, they will charge you an additional management fee, which will be outlined in their separate advisory agreement.

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.

Additional information about our fees is in Item 5 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/118471>.

Conversation Starters:

Help me understand how these fees and costs may 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 ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we act as your investment adviser, we must 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 with.

Here are some examples to help you understand what this means:

- Some of our financial professionals are licensed insurance agents who may sell insurance products for a commission.
- Some of our financial professionals are dually registered as a registered representative of a broker dealer who may sell brokerage products for a commission.
- We may utilize third party sub-advisors to manage a part or all your portfolio. In these cases, you may pay additional fees for the use of the third-party sub-advisor.

Conversation Starters:

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

Additional information about our conflicts of interest is located in Item 10 and 12 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/118471>.

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are compensated based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, and the time and complexity required to meet a client's needs.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Visit Investor.gov/CRS for a free and simple search tool to research GAMLLC and our financial professionals.

Conversation Starters:

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

ADDITIONAL INFORMATION

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #118471. You may also contact our firm at (919) 313-6650 to request a copy of this relationship summary and other up-to-date information.

Conversation Starters:

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?