

Relationship Summary

We are Pactolus Private Wealth Management, LLC (“Pactolus”), an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage 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. Our firm and financial professionals’ registration information are also publicly available on this website.

What investment services and advice can you provide me?

We offer customized investment advisory, financial planning and administration, and family office, concierge, and tax planning services to retail investors. We offer our investment advisory services exclusively through a wrap fee program. We offer advice on a full suite of securities, including equities, fixed income, mutual funds, ETFs, options, and similar investments. Our services are generally provided on a discretionary basis, which means that we have the power to buy and sell securities for your account without your prior consent. This authority is usually unlimited and remains in effect until you revoke it. We may provide non-discretionary investment advice, where we make investment recommendations to you and you decide whether to implement the recommendation. We do not give advice on any proprietary investment products.

We usually review portfolios at least annually. However, we do monitor accounts on a continuous basis and conduct ad hoc reviews if you change your objectives or risk tolerance, upon significant market and economic events, or if we change our investment strategy.

We do not require a minimum account size or fee.

Please see Items 4, 7, and 8 of our [Part 2A Brochure](#) and Items 4 and 5 of our [Wrap Brochure](#) for additional information on our services, investment advice, and account requirements.

Other Questions You May Have

Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?

Our quarterly fees are calculated as a percentage of the assets under our management, so our fees will rise and fall with the value of the assets we manage for you. As a result, we are economically incented to recommend that you place more assets in your account in order to increase the value of your portfolio, because as the value increases, so do our fees.

In addition, we provide our services on a wrap fee basis. For wrap accounts, transaction costs and our advisory fee are included in the total asset-based wrap fee we charge you, which may be higher than in a non-wrap account. Wrap accounts create conflicts of interest in that they incentivize us to trade infrequently. Trading infrequently does not assure positive portfolio performance. **Please review Item 4 of our [Wrap Brochure](#) for information regarding conflicts of interest.**

We may also charge performance-based fees to qualified clients. Because performance-based fees involve a sharing of any portfolio gains between the client and the investment manager, they create an economic incentive for us to take additional risks in the management of a client portfolio.

Financial planning fees will be charged at an hourly or fixed rate as agreed upon by you and the firm.

Some securities carry additional costs, such as mutual funds and ETFs. There are additional fees such as internal fees and expenses charged by mutual funds (i.e., 12b-1 distribution fees and management fees that are assessed within the mutual fund) and exchange-traded funds, third-party separate account manager fees, fees imposed by private placements and pooled investment vehicles, postage and handling, transfer taxes, SEC fees for sales of securities.

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. **You can find more information about our fees and costs under Item 5 of our [Part 2A Brochure](#) and Item 4 of our [Wrap Brochure](#).**

Other Questions You May Have

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 interests 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 is an example to help you understand what this means:

- The manager of Pactolus manages proprietary private funds, which creates conflicts of interest relating to compensation and fees.
- Our affiliate Pactolus Securities, LLC dba Pactolus Capital Partners is a registered broker-dealer. Certain Pactolus professionals are registered with Pactolus Capital Partners, which creates conflicts of interest regarding compensation.

Additional information regarding conflicts of interest can be found in Items 5, 10, and 11 of our [Part 2A Brochure](#).

Other Questions You May Have

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

How do your financial professionals make money?

Our financial advisors are paid either a percentage of the fees we collect from you or a salary and bonus. We are incentivized to recommend that you add additional assets to your advisory account. Our financial advisors may be paid sales, service or administrative fees for the sale of mutual funds or other investment products. We do not receive non-cash compensation.

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

Yes, certain Pactolus professionals have disciplinary records, which can be found by accessing Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Other Questions You May Have

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

You can find additional information about our investment advisory services on our [Part 2A Brochure](#). You may contact us at 571-297-6364 or via email to requests@pactolus.com if you have questions or to request a current copy of this Relationship Summary.

Other Questions You May Have

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?