



## Asia Pacific Financial Management Group, Inc. Client Relationship Summary, February 28, 2021

Asia Pacific Financial Management Group, Inc. is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

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

We offer both brokerage services and investment advisory services.

#### Brokerage Services

As an introducing securities broker dealer, our brokerage services include buying and selling of securities (mutual funds, stocks, and bonds) for your account at your direction. Upon request or from time to time, we provide you with investment recommendations, research, financial tools, and investor education.

**Account Monitoring:** We do not have discretionary authority over your brokerage account. We do not make decisions to buy or sell your investments without your direction nor do we provide monitoring of your brokerage account investments, unless we state otherwise in writing. This means you are responsible to review your account and investment allocations to make sure your investment mix is appropriate for you. You decide whether to follow our investment recommendations and you make the ultimate investment decisions.

**Account Minimums:** We request a minimum account size of \$50 thousand of assets per client to open an account, but this amount can be negotiated.

**Limited Investment Offerings:** We offer and make recommendations on non-proprietary products. We do not offer or make recommendations on all products of any type; for example, we do not offer or make recommendations on all mutual funds or make available all share classes of the offered mutual funds.

#### Investment Advisory Services

We provide investment advisory services by providing investment advice on managing your account and providing personalized financial planning.

**Account Monitoring:** We supervise and direct the investments of your account on a **discretionary and non-discretionary** basis. When we act in a **discretionary** capacity, we have the authority to buy and sell for your account on your behalf. You authorize us to be your agent and act in such capacity to provide instructions on your account and to take all other actions necessary to execute such instructions. When we act in a **non-discretionary** capacity, we will buy and sell securities at your direction.

**Account Minimums:** We typically do not set an account minimum to open an advisory account. However, some platforms may require investment minimums.

For additional information on our services, refer to Form ADV <https://adviserinfo.sec.gov/firm/summary/32338> by clicking on the "Part 2 Brochures" link.

## CONVERSATION STARTERS

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?

#### Brokerage Services

For our brokerage services, you will pay transaction-based fees, when you buy or sell securities. This fee is generally referred to as a commission, sales charge, load, or trails. You will also incur handling and processing fees on each transaction. Additionally, you will pay the following fees associated with your brokerage account, account maintenance fees or IRA custodial fees, fees for certain services you select such as wire transfers, margin fees, termination and/or transfer 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.**

#### Investment Advisory Services

For our investment advisory services, you will pay a management fee based on the market value of your account and in accordance with the schedule of fees agreed to by both parties. The fees are asset-based. This means the more assets there are in our account, the more you will pay in fees, and we have an incentive to encourage you to increase the assets in your account.

**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 about our fees and charges, refer to Form ADV <https://adviserinfo.sec.gov/firm/summary/32338> by clicking on the "Part 2 Brochures" link.

## CONVERSATION STARTER

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 providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice, we provide you. Here are some examples to help you understand what this means.**

## **Revenue Sharing**

The companies that sponsor, manage, and/or promote certain investments offered by us earn revenue by charging you a fee, such a management fee in a mutual fund. A portion of these fees may be shared with us. We use the payments in part to support activities related to servicing client accounts, to provide educational programs and technology applications to financial professionals, and to provide ongoing product support for certain investments. We have an incentive to promote the product that shares the most revenue over those that share less revenues or none at all.

## **Affiliated Service Providers**

We use affiliates for services for clients within our programs, like for custody, administration, and brokerage, which incents us to retain these affiliates over other providers because of the fees earned for the services.

### **CONVERSATION STARTER**

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

## **How do your financial professionals make money?**

Our financial professionals are compensated based upon a percentage of advisory fees, assessed quarterly at the agreed upon rate upon account opening; commissions, markups and markdowns earned in brokerage accounts, which vary by product; and ongoing fees from mutual funds. Conflicts of interest can arise since financial professionals receive compensation based on a portion of the fees paid and as the revenue earned from their client accounts increases. This potentially incentivizes them to increase revenue on your and other clients' accounts.

Our financial professionals do not receive non-cash compensation.

## **Disciplinary History**

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

Yes, Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research the firm and its financial professionals.

### **CONVERSATION STARTER**

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

## **Additional Information**

For additional information about our services, or if you would like additional, up-to-date information or a copy of this disclosure, please contact our Firm at (671) 472-6400.

### **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?