

**Form CRS – Form ADV Part 3**  
**Wright Private Asset Management LLC - Relationship Summary**  
**March 2, 2022**

**Introduction:** Wright Private Asset Management LLC (“WPAM” or the “Adviser”) is registered with the U. S. Securities and Exchange Commission as an investment adviser. Registration does not imply a certain level of skill or training. Brokerage and investment advisory services and fees differ, and it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS which also provides educational materials about broker-dealers, investment advisers, and investing.

**What investment services and advice can we provide you?:** WPAM offers investment advisory services to retail investors. We design and implement investment strategies utilizing equities, fixed income securities, exchange traded funds and mutual funds to help achieve your investment goals. We monitor and rebalance your accounts on an ongoing basis and communicate with you periodically (but no less than annually). We offer advisory accounts for which we exercise investment discretion, *i.e.* discretionary accounts, and accounts for which we do not exercise investment discretion, *i.e.*, non-discretionary accounts. A discretionary account allows us to buy and sell investments in your account, without asking you in advance, but in compliance with the Letter of Governing Instructions signed by you based on investment objectives and constraints. In a non-discretionary account, we provide investment advice and trades are executed only after receiving your written approval. To open an account, the Adviser does require a minimum account size or minimum annual fee. For additional information, please refer to our Form ADV Part 2A.

**Additional Questions to Ask**

**Ask our financial professionals these key questions about our investment services and accounts.**

- 1. Given my financial situation, should I choose an investment advisory service? Why or why not?**
- 2. How will you choose investments to recommend to me?**
- 3. What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

**What fees will I pay?:** You will be charged an on-going asset-based fee based on the market value of your account at the beginning of each billing period. This market value will be adjusted for net of deposits and withdrawals made during the previous quarter, as applicable. The fees are generally charged in advance pro rata at the end of the initial quarter at the time of deposit(s). Thereafter, fees are typically charged quarterly in advance. The more assets in your account, the more you will pay us in fees. As such, we may have an incentive to encourage you to increase the assets in your account. However, the fee rate could decline based on level of assets per our fee schedule. Additionally, you will pay, where applicable, brokerage commissions and transaction fees. Mutual funds and exchange traded funds also charge internal expenses, including management fees, distribution and service fees which are disclosed in each mutual fund’s prospectus. In some cases, where mutual funds are included in an account, we, or one of our affiliates, may retain distribution and/or service fees. We may have an incentive to recommend such funds. However, if we collect such fees then we provide credit to your asset-based fees due upon our receipt of fees from mutual funds so as to not double charge your account. We allow clients to restrict the use of any investment product including mutual funds that have distribution and service fees. Since our fees are asset-based 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. Additional detailed information of all fees you pay can also be found in your investment advisory agreement.

**Additional Questions to Ask**

**Ask our financial professionals these key questions about the impact of fees and costs on investments.**

- 1. Help me understand how these fees and costs might affect my investments.**
- 2. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

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**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 to you. Here is an example to help you understand what that means.*

- **Proprietary or Personnel Trading:** We may use the same strategy for our personal investment accounts that we do for your investment advisory accounts and effect transactions in our personal investment accounts at the same time as you as part of a block trade. Eligible trades that require pre-approval are reviewed by our Chief Investment Officer of Equities or Chief Investment Officer of Fixed Income prior to an employee being allowed to place a trade to ensure there is no conflict with your investment advisory account. Our employees are monitored for their adherence to our employee trading policy which is in place to protect the best interests of our clients. For additional information about any conflicts of interest, please refer to our Form ADV Part 2A.

<b>Additional Questions to Ask</b>
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<b>Ask our financial professionals these key questions about conflicts of interests.</b>
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| <b>1. How might your conflicts of interest affect me, and how will you address them?</b> |
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**How do our financial professionals make money?** Our financial professionals are compensated in the following ways: Cash compensation in the form of an annual salary and a quarterly discretionary bonus based on our profitability.

**Do we or our financial professionals have legal or disciplinary history?** No. Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

<b>Additional Questions to Ask</b>
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<b>Ask our financial professionals these key questions about our disciplinary history.</b>
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| <b>1. As a financial professional, do you have any disciplinary history?</b> |
| <b>2. For what type of conduct?</b>  |

### **Additional Information**

We encourage you to seek out additional information about our investment advisory services and to request a copy of this relationship summary by contacting our Chief Compliance Officer, Michael Fleming, at (203) 783-4400 or via email at [mflaming@wisi.com](mailto:mflaming@wisi.com).

For additional information on our investment advisory services, see our Form ADV Part 1A and ADV Part 2A Brochure on [adviserinfo.sec.gov](http://adviserinfo.sec.gov) or [Investor.gov](http://Investor.gov) and the ADV Part 2B Brochure Supplements we provide with respect to our financial professionals.

<b>Additional Questions to Ask</b>
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<b>Ask our financial professionals these key questions about contact and complaints.</b>
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| <b>1. Who is my primary contact person?</b>  |
| <b>2. Is he or she a representative of an investment adviser or broker-dealer?</b>   |
| <b>3. Who can I talk to if I have concerns about how this person is treating me?</b> |