

## ITEM 1. INTRODUCTION

GEM Asset Management, LLC is registered with the Securities and Exchange Commission as an investment adviser. 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 investors in order to research firms and financial professionals at the SEC's investor education website [Investor.gov/CRS](http://Investor.gov/CRS). This summary is intended to be viewed with our [Part 2A of Form ADV](http://adviserinfo.sec.gov/firm/brochure/124332) available at [adviserinfo.sec.gov/firm/brochure/124332](http://adviserinfo.sec.gov/firm/brochure/124332).

## ITEM 2. RELATIONSHIPS AND SERVICES

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

We offer investment advisory services including investment management services and financial planning. We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis. As part of our standard investment management services we monitor our client accounts at least quarterly. We review accounts more frequently when, for example, market conditions warrant or if there are changes in a client's circumstances. If we are engaged solely for financial planning services, we do not monitor an account.

We accept discretionary authority to determine, without obtaining your specific consent, the identity and amount of securities to be bought or sold. However, such discretion is to be exercised in a manner consistent with the stated investment objectives for your particular account. When selecting securities and determining amounts, we observe your investment objectives and restrictions.

We do not offer proprietary products. We primarily offer advice on mutual funds and exchange traded funds including both active and passive strategies. We do not place restrictions to establish a relationship or to open or maintain an account with us, such as a minimum account size or investment amount.

*For additional information regarding our services and requirements to establish a relationship with us, please see Item 4 (Advisory Business) and Item 7 (Types of Clients) of our [Part 2A of Form ADV](http://adviserinfo.sec.gov/firm/brochure/124332), respectively.*

#### **Consider asking our financial professional the following questions:**

- ***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?***

## ITEM 3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

### *What fees will I pay?*

Our financial planning services are offered for a fixed fee based on the complexity of the plan. Our investment management services are charged using an annual asset-based tiered schedule fee, payable on a quarterly basis. Tiered fees refer to fee schedules where, as the value of account assets, including cash and cash equivalents, reaches a new threshold, the assets above that threshold are charged successively lower percentages. The more assets in your account, the more you will pay in fees. We have an incentive to grow the investments in your account and encourage you to increase the assets in your account.

In addition to our fee, you will incur other fees and charges imposed by third parties. Third party fees include, but not limited to, wire transfer and electronic fund fees, fees on securities transactions and fees charged by mutual funds and ETFs that are held in your portfolio. **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 including our billing arrangements, how to pay our fee, and additional fees and expenses you will pay third parties directly or indirectly, please see Item 5 (Fees and Compensation) of our [Part 2A of Form ADV](#).

Consider asking our financial professional the following questions:

- **Help me understand how these fees and costs might affect my investments.**
- **If I gave 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.

- As part of our financial planning services, we will recommend our own services to manage your account.
- We have access to education and analytics tools, practice management support, and other resources from the broker we recommend.

For additional information regarding these conflicts, please refer to Item 4 (Advisory Business), Item 5 (Fees and Compensation) and Item 12 (Brokerage Practices) of our [Part 2A of Form ADV](#). The conflicts disclosed in this summary are not our sole conflicts. Please refer to our [Part 2A of Form ADV](#) for additional disclosures on our conflicts.

Consider asking our financial professional the following questions:

- **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 paid a base salary in addition to compensation based upon the amount of new business brought to us or accounts serviced by our financial professionals. This arrangement creates a conflict of interest for the financial professional in that he or she has an additional financial incentive to find new business, which could impact their recommendations.

## **ITEM 4. DISCIPLINARY HISTORY**

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

No. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for free and simple search tools to research us and our financial professionals.

Consider asking our financial professional the following questions:

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

## **ITEM 5. ADDITIONAL INFORMATION**

For additional information about our services, please refer to our [Part 2A of Form ADV](#). To request up-to-date information or a free copy of this Client Relationship Summary, please call (734) 737-9108.

Consider asking our financial professional the following questions:

- **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?**