

**SPECTRUM WEALTH COUNSEL, LLC.**  
**FORM CRS, CUSTOMER RELATIONSHIP SUMMARY**  
**THIS FORM WAS LAST UPDATED: MARCH 20, 2023**



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| <p>Introduction</p>                                                | <p>Our firm, Spectrum Wealth Counsel, LLC, doing business as Spectrum Wealth Management (“SWM” or “Firm” or “We”), is an investment adviser registered with the Securities and Exchange Commission.<sup>1</sup></p> <p>Investment advisory services and fees differ from that of brokerage services and fees. It is important for you, the retail investor, to understand the difference. Our firm provides investment advisory services. Our firm does not provide brokerage services. This document provides a summary of the types of services we provide to retail investors, which are natural persons who seek or receive services primarily for personal, family or household purposes, and how you pay for these services. Please ask us for more information. If you want to learn more, free and simple tools are available to research firms and financial professionals at <a href="https://www.investor.gov/CRS">https://www.investor.gov/CRS</a>, which also provides educational materials about investment advisers, broker-dealers, and investing.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>What investment services and advice can you provide for me?</p> | <p>As an investment adviser with fiduciary obligations, SWM provides comprehensive wealth management services to our clients on a discretionary basis. Discretionary means we will decide which investments to buy or sell for your account. Wealth management services, which SWM trademarked LifeSpectrum Planning™, is designed to build a framework for financial decision-making. LifeSpectrum Planning™ entails an intensive data-gathering process of the client’s current financial condition. This service is designed to be an ongoing process of continual monitoring and refinement. We do not offer active management on a non-discretionary basis but have accommodated clients with non-discretionary accounts. Clients who elect non-discretionary investment management must make the ultimate decision regarding the purchase or sale of investments in their account.</p> <p>SWM has a standard minimum account size of \$1,000,000 for the LifeSpectrum Planning offering. Smaller accounts may be accepted into the Accumulator Wealth Management Service based on several factors and account relationships. Clients in the Accumulator Wealth Management Service are moved to the Wealth Management platform upon obtaining the minimum account requirement.</p> <p>Trust Services are provided under the separate name of Spectrum Private Trust (“SPT”). SPT offers high net-worth individuals and families coordinated legacy planning of client estate plans. SPT acts as a trust representative office of National Advisors Trust Company, FSB (“NATC”). SPT will meet with the client(s) and refer the clients to NATC for trust development. Once established, SPT meets with the client to create an in-depth financial plan. SPT will review the plan on an ongoing basis and provide recommendations to the Trustee on implementing the plan(s).</p> <p>Consulting services are provided for clients looking for advice regarding their qualified retirement plans. SWM will also provide a one-time financial planning engagement, investment portfolio review, divorce consulting, facilitate family meetings, business succession planning, and consulting with personal representatives in estate matters that relate to financial assets.</p> <p>For additional information about how we invest, please review our firm’s <a href="#">Form ADV, Part 2A</a> Disclosure Brochure, Items 4, 7, and 8.</p> <p style="text-align: center;"><b>Key Questions to Ask Your Financial Professional</b></p> <ul style="list-style-type: none"> <li>➤ <b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li> <li>➤ <b>How will you choose investments to recommend to me?</b></li> <li>➤ <b>What is your relevant experience, including licenses, education, and other qualifications?</b></li> <li>➤ <b>What do these qualifications mean?</b></li> </ul> |
| <p>What fees will I pay?</p>                                       | <p>Comprehensive wealth management services are included with the fees charged for Investment Management. SWM is compensated by charging its clients ongoing fees based upon a percentage of each client’s assets under management. Fees are typically directly debited from the qualified custodian, quarterly, in advance, by Spectrum and are based on the custodial value of the client’s account at the end of the previous calendar quarter multiplied by one-quarter of the applicable annual percentage rate. Our management fees are tiered and apply break levels when you have invested certain amounts. Accumulator clients will pay a fee for investment management and a separate fee for financial planning services.</p> <p>For more information about our fees and to review our fee schedules, please see Item 5 - Fees of our firm’s <a href="#">ADV Part 2A</a>. Please contact us with questions or concerns about our fees or your account.</p> <p>Clients may also expect to pay the following fees to third parties (not SWM): a) brokerage fees for securities transactions; b) fees charged by ETFs, mutual funds, and any other investment companies in which they invest; and c) fees to third-party advisers if they engage one. Please see Items 5 and 12 of our firm’s <a href="#">ADV Part 2A</a> for additional information regarding these expenses.</p> <p><i>When our firm charges you an asset-based fee, you should be aware that the more assets that are in your retail account, the more you will pay in fees. Therefore, the firm has the incentive to encourage you to increase the assets in your account. One example of this is encouraging a client to roll over their 401(k) assets into an account that the advisor can manage and thereby earn an asset-based fee. You are never under any obligation to add new assets to your account.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

<sup>1</sup> Registration does not imply any specific level of skill or training.

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| <p>What fees will I pay?<br/>(Continued)</p>                                           | <p>Consulting fees vary and are negotiable due to the complexity and size of the project. Fees will be either hourly or fixed fees. You will agree to these fees in writing prior to the commencement of such services.</p> <p><b>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.</b></p> <p style="text-align: center;"><b>Key Questions to Ask Your Financial Professional</b></p> <ul style="list-style-type: none"> <li>➤ <b>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?</b></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>What are your legal obligations to me when acting as my investment adviser?</p>     | <p><b>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 recommendations we provide you. Here are some examples to help you understand what this means.</b></p> <p>SWM recommends either Schwab or Fidelity to act as qualified custodians. Schwab's and Fidelity's platforms make available to our firm products and services that benefit our firm but may not directly benefit all of our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab or Fidelity.</p> <p>As part of our investment advisory services to clients, SWM may recommend that the client withdraw qualified retirement plan assets and roll the assets over into an individual retirement account ("IRA") that SWM (or another adviser) will manage. If the client elects to roll the assets to an IRA managed by our firm, the client will be charged an asset-based fee. This practice presents a conflict of interest because SWM has a financial incentive to recommend the rollover to the client based on the potential revenues rather than solely on the client's needs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>How else does your firm make money, and what conflicts of interest do you have?</p> | <p>Our firm or persons associated with our firm can buy or sell the same securities that we recommend to you or in which you are already invested. A conflict of interest could exist in such cases if we had the ability to trade ahead of you and potentially receive more favorable prices than you receive. Most of our financial professionals are paid a portion of the management fee we receive on assets we manage for you. You should be aware that the more your portfolio grows, whether because of market performance or additional assets under management, the greater your financial professional's compensation will be. A limited number of our financial professionals will receive a salary and may be entitled to receive a year-end bonus for their overall performance based on the revenue they earn. Investment Advisor Representatives, acting in their additional role as insurance agent, will receive insurance commissions, incentives, and advisory fees for products previously sold before 2012 or sold before their employment by SWM. Some of our financial advisors are eligible for additional compensation from our indirect parent company, Focus Financial Partners, LLC (or one of its affiliates), depending on our earnings. This potential for increased compensation provides an incentive for these financial advisors to encourage you to maintain and even increase the size of your investment account with us. See your financial advisor's Brochure Supplement for more information about your individual financial advisor's compensation.</p>                                                                                                                                                                                                                                                                                                                                                 |
| <p>How do your financial professionals make money?</p>                                 | <p>Some of our financial advisors are eligible for additional compensation from our indirect parent company, Focus Financial Partners, LLC (or one of its affiliates), depending on our earnings. This potential for increased compensation provides an incentive for these financial advisors to encourage you to maintain and even increase the size of your investment account with us. See your financial advisor's Brochure Supplement for more information about your individual financial advisor's compensation. Financial professionals are also entitled to the revenue the firm and/or our affiliates generate from the professional's services or recommendations. This presents a conflict and incentive for the financial professional to recommend certain products or services offered by our affiliates.</p> <p>We and our affiliates refer clients to third-party service providers and are eligible to receive additional compensation for those referrals.</p> <p>For more information about your financial professional's activities and education, review the individual's ADV Part 2B Supplement. You may please request a copy from your financial professional.</p> <p>Our firm has a duty to disclose all material conflicts to you. Please refer to our <a href="#">Form ADV Part 2A</a> brochure, Items 10, 11, 12, and 14 for a discussion of our conflicts of interest. You can request a copy of the ADV Part 2A or obtain a copy from our firm's website. The ADV Part 2B Supplement describes your financial professional and outlines specific conflicts regarding that individual. Please review these pieces carefully and consult us with any questions or concerns.</p> <p style="text-align: center;"><b>Key Questions to Ask Your Financial Professional</b></p> <ul style="list-style-type: none"> <li>➤ <b>How might your conflicts of interest affect me, and how will you address them?</b></li> </ul> |
| <p>Do you or your financial professionals have a legal or disciplinary history?</p>    | <p>No, for our firm, and yes, for our financial professionals. For a free and simple tool to research the firm or its financial professionals, please see <a href="http://Investor.gov/CRS">Investor.gov/CRS</a>.</p> <p style="text-align: center;"><b>Key Questions to Ask Your Financial Professional</b></p> <ul style="list-style-type: none"> <li>➤ <b>As a financial professional, do you have any disciplinary history? If so, for what type of conduct?</b></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>Additional Information</p>                                                          | <p>Additional information about our firm can be found at <a href="https://www.spectrum-mgmt.com/">https://www.spectrum-mgmt.com/</a> and <a href="https://adviserinfo.sec.gov/">https://adviserinfo.sec.gov/</a>. You can obtain a copy of this relationship summary, or any other up-to-date information, upon request and free of charge by contacting us at: (317) 663-5600.</p> <p style="text-align: center;"><b>Key Questions to Ask Your Financial Professional</b></p> <ul style="list-style-type: none"> <li>➤ <b>Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer?</b></li> <li>➤ <b>Who can I talk to if I have concerns about how this person is treating me</b></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |