



Client Relationship Summary - March 2021

ATON Financial LLC (“ATON”) is an investment adviser registered with the U.S. Securities and Exchange Commission. Investment advisory and brokerage services and fees differ; therefore, 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 investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, including asset management and financial planning. Asset management services include portfolio management by ATON as well as the selection and monitoring of other investment managers. As part of our standard services, we monitor our clients’ portfolio holdings and the overall asset allocation strategy on an ongoing basis, or when market conditions or other triggers would warrant a review. Triggers include a change of investment objectives, a change in employment, or a change in recommended asset allocation weightings. Financial plans of clients that don’t engage us for ongoing services are not monitored. However, financial plans of ongoing clients are monitored on an ongoing basis.

We offer our asset management services on a discretionary or nondiscretionary basis. Discretionary asset management allows us the limited authority to buy and sell investments in your account without asking you each time a transaction is placed. With non-discretionary asset management, we provide investment recommendations but require your approval before placing trades for your account. You make the ultimate decision regarding the purchase or sale of investments. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

We provide investment recommendations and construct portfolios using a wide array of securities types to meet the investment objectives of clients. We do not have any minimum requirements for opening or maintaining accounts for retail investors.

For additional information, please see our Form ADV Part 2A (with special emphasis on Items 4, 7, and 16) which can be found on our website at www.atonfinancial.com.

Conversation Starters – Ask Your Financial Professional:

Given my financial situation, should I choose investment advisory 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?

Principal Fees: We are compensated for providing the investment advisory services either by charging an ongoing, tiered asset-based fee that ranges from 0.75% to 1.50% per annum depending on the value of the assets we manage for you based on the balance of the portfolio assets at the end of each quarter, and adjusted for deposits and withdrawals during the quarter, or on a fixed fee annual retainer of up to \$15,000 per year. The fees are charged quarterly in arrears. With the asset-based fee, the more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account. Comprehensive financial plans are developed for a fixed fee of \$5,000 which may be charged in advance or arrears. Ongoing financial planning services are available for \$500 per month in arrears. Clients can opt to pay an hourly fee for either investment management or financial planning services at a rate of \$250 per hour invoiced in arrears as the work performed.

Other Fees and Costs: ATON’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. You may incur certain charges imposed by custodians, brokers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in the funds’



prospectuses. These fees will generally include a management fee and other fund expenses. All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **More detailed information about our fees and costs are included in our Form ADV Part 2A (Item 5).**

Conversation Starter – Ask Your Financial Professional:

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 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 is an example to help you understand what this means.

Investment Advisor Representatives (IARs) of ATON are also licensed and registered as insurance agents to sell various insurance products. Therefore, they will be able to purchase insurance products for clients in need of such services and will receive separate, yet typical commission compensation for the purchase of those products. While the IARs are required as fiduciaries to put the interest of the clients first, the receipt of additional compensation itself creates a conflict of interest. You are under no obligation to purchase insurance products through ATON or its IARs. **These arrangements and additional information about other conflicts of interest are discussed in more detail in our Form ADV Part 2A.**

Conversation Starter – Ask Your Financial Professional:

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

How do your financial professionals make money?

Our IARs are compensated through the receipt of a portion of revenue we receive for the advisory services we provide. The portion paid to your IAR generally does not vary based on the type of investments that are recommended.

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

Yes. We invite you to visit Investor.gov/CRS for a free and simple search tool to research our Firm and financial professionals.

Conversation Starter – Ask Your Financial Professional:

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

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on Investor.gov or adviserinfo.sec.gov (CRD# 173070). Alternatively, you can call us at 787-459-1780 to speak with us directly to request up-to-date information and request a copy of the relationship summary.

Conversation Starters – Ask Your Financial Professional:

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?