

Form CRS: Client Relationship Summary

July 29, 2022

INTRODUCTION

Commonwealth Equity Services, LLC, doing business as Commonwealth Financial Network® (“Commonwealth,” “we,” “our,” or “us”), is registered with the Securities and Exchange Commission (“SEC”) as both an investment adviser and broker/dealer and is a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). Detailed information regarding our registration status is available at brokercheck.finra.org. Our investment advisory and brokerage services and fees differ, and it is important for you to understand these differences. Free and simple tools are available for you to research firms and financial professionals at www.investor.gov/CRS, where you will also find educational materials about investment advisers, broker/dealers, and investing.

What investment services and advice can you provide me?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. This document provides a summary of the types of services Commonwealth provides and how you pay for those services. The advisory and brokerage services offered by Commonwealth’s independent financial professionals can differ. It is important that you discuss with your financial professional the specific services they offer and whether those services are appropriate for your financial situation.

As an investment adviser, Commonwealth can provide investment advice to you for a fee. Commonwealth’s investment advisory services consist of managed account programs, wrap account programs, wealth management services, retirement plan consulting services, and co-advisory services with unaffiliated third-party portfolio managers. **More information about our investment advisory services is available in our Form ADV Part 2A Brochure, available at www.commonwealth.com/for-clients/disclosure/adv-part-2a.**

The primary brokerage services offered include recommendations to buy and sell stocks, bonds, and mutual funds, as well as certain insurance products and alternative investments. Many of these investments can be held in accounts (“brokerage accounts”) with one of the two clearing firms with which we have a relationship. Other investments are held in accounts directly with the issuer of the securities purchased (sometimes referred to as “direct-held accounts”). We also offer IRAs, where your investments will be held with the custodian of the IRA. **More information about our brokerage services can be found in our Investor Disclosure Brochure, available at www.commonwealth.com/for-clients.**

Investment Adviser Services	Broker/Dealer Services
Monitoring Services	
Commonwealth monitors retail investors’ investments in our Preferred Portfolio Services® (“PPS”) programs on an ongoing basis, as well as in advisory programs through unaffiliated third parties when we are a co-advisor, and we provide monitoring services as part of certain wealth management and retirement consulting services.	Commonwealth does not monitor investments held in brokerage accounts or direct-held investments. Your financial professional can provide periodic account reviews upon request.



Investment Adviser Services	Broker/Dealer Services
Investment Authority	
In most of our managed account and wrap account programs, you give Commonwealth discretion over investment trading. You may also choose to have your account managed on a nondiscretionary basis.	Commonwealth does not have discretionary investment authorization over your brokerage accounts or direct-held investments, except as may be necessary to satisfy margin calls or other debt obligations. You make the ultimate decision regarding the purchase or sale of investments.
Limited Investment Offerings	
Commonwealth provides most of its investment advice through its PPS programs. These programs neither use proprietary securities products nor restrict investment advice to a limited menu of investments.	Commonwealth does not offer proprietary products or limit its menu of products or types of investments.
Account Minimums and Other Requirements	
Commonwealth's advisory programs require clients to meet certain program account minimums, which vary from program to program. Minimums may be waived at Commonwealth's discretion.	Commonwealth does not have minimum requirements for retail investors to open or maintain brokerage accounts or purchase or hold direct-held investments.

Commonwealth encourages you to ask your financial professional the following questions:

- *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?*

FEES, COSTS, CONFLICTS OF INTEREST, AND STANDARD OF CONDUCT

What fees will I pay?

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. Below is a summary description of the fees and costs you will pay based upon the services you select.

Investment Adviser Services

- Most of our asset management programs or services require you to pay a fee that is a percentage of the dollar value of the investments being managed. This type of fee is typically referred to as an "asset-based fee." We offer two types of programs that charge an asset-based fee. We refer to one as a "traditional managed account" program and the other as a "wrap account" program. Depending on the program or service selected, asset-based fees are billed on either a monthly or quarterly basis.
- In our traditional managed account programs, the asset-based fee covers only the cost of our advisory services, so you will be charged separately for any other fees you incur in connection with the management of your account, such as transaction fees, administrative services fees, and IRA and qualified retirement plan maintenance fees.
- In our wrap account programs, you will pay asset-based fees that cover the cost of advisory services as well as certain transaction costs and administrative fees charged by the broker/dealer or bank that has custody



of your assets. Therefore, the asset-based fees in wrap account programs are typically higher than the fees in traditional managed account programs. Depending on the frequency of trading and the types of investments purchased and sold in a wrap account, wrap account programs may result in higher fees overall.

- In addition to the direct fees clients pay, certain products have additional fees that are associated with the products themselves. Examples of these fees include mutual fund or money market 12b-1 fees, sub-transfer agent fees, distributor fees, management fees, and administrative expenses. As a matter of policy, Commonwealth credits the 12b-1 fees it receives from mutual funds purchased or held in advisory accounts back to the accounts paying such 12b-1 fees.
- In general, the more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the amount of assets in your account. Financial professionals may reduce their fee as a percentage of assets under management when their clients reach certain levels of account or household assets.
- Clients receiving wealth management and retirement plan consulting services have the option of paying asset-based fees, flat fees, or hourly rates. These are billed as stated in your advisory contract.
- **You should review items 4 and 5 of Commonwealth's Form ADV Part 2A Brochure, available at www.commonwealth.com/for-clients/disclosure/adv-part-2a, for a description of specific advisory programs and services, as well as how you are charged and how we are compensated.**

Broker/Dealer Services

- Every time you buy or sell an investment, you will pay a transaction-based fee. A transaction-based fee is commonly known as a "commission." The commission rate or amount you will pay for a transaction varies depending on the investment and the size or amount of the transaction.
- In addition to commissions, certain products, including mutual funds and variable annuities, have ongoing fees, such as 12b-1 fees and "trail commissions," that will be paid to us for as long as you own the investment. Additional fees can include custodian fees, mutual fund expenses, and other fees and charges in connection with a specific type of account. These include transaction service fees, variable annuity and insurance product management fees, mortality and expense charges, rider fees, deferred sales or "surrender" charges on mutual funds and variable insurance products, and other miscellaneous account and service fees.
- Information regarding the fees and costs of mutual funds, annuities, and similar investments is available in the prospectus for the specific product. Contact your financial professional or call the product sponsor company for a copy of the prospectus.
- Brokerage account investors will be charged more when there are more trades in their accounts. As a result, Commonwealth has an incentive to encourage investors to trade often.

Commonwealth has prepared an Investor Disclosure Brochure to assist you in locating detailed information on fees, costs, and conflicts of interest involved in our brokerage services. This brochure can be found at www.commonwealth.com/for-clients.

Commonwealth encourages you to ask your financial professional the following question:

- ***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 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 and investment advice we provide you. Here are some examples to help you understand what this means.



Commonwealth receives payments from third-party sponsor companies, such as unaffiliated mutual fund and insurance companies, in the form of due diligence fees, conference fees, and revenue sharing. Your financial professional does not share in these payments. This additional compensation to Commonwealth presents a conflict of interest because we have a greater incentive to make available or recommend investments that provide these additional payments to us over investments that don't. Since the compensation we receive varies among and between issuers and different investments and types of investments that we offer as a broker/dealer, we have an incentive to sell you those investments that pay us more compensation.

Commonwealth's clearing relationship with National Financial Services ("NFS") provides us with substantial economic benefits and incentives to use NFS as our clearing firm and recommend investments on NFS's platform. The money and benefits we receive from NFS create conflicts of interest between us and our clients. For example, Commonwealth and your financial professional share in the commissions you pay on buy/sell transactions executed through NFS, including the "markups" you pay when you buy or sell a security with us on a principal (dealer) basis. A markup is the amount you pay that is greater than the price of the security bought or sold. In addition, Commonwealth receives revenue from NFS based on the types of transactions recommended and the investments held in client accounts at NFS, including cash you hold in your Core Account Sweep Program. This program creates substantial financial benefits for Commonwealth and NFS. Your financial professional does not receive any of these payments. **Investors should review items 5, 12, and 14 of Commonwealth's Form ADV Part 2A Brochure, available at www.commonwealth.com/for-clients/disclosure/adv-part-2a, for more information about how we make money when providing advisory services and the conflicts of interest relating to our advisory business.**

Investors should review our Investor Disclosure Brochure for more information about how we make money when providing brokerage services and the conflicts of interest relating to our brokerage business.

Commonwealth encourages you to ask your financial professional the following question:

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

How do your financial professionals make money?

Commonwealth's financial professionals are compensated based on a variety of factors, such as the amount of client assets they service; the time and complexity required to meet your needs; and the products, programs, or services offered or sold to you.

In addition to receiving commissions and/or advisory fees, your financial professional has the opportunity to receive "noncash compensation" in the form of reimbursements for marketing expenses and business development costs, as well as with invitations to conferences and due diligence meetings where travel-related costs, expenses, meals, and entertainment are paid for or subsidized by the investment product providers. This additional compensation presents a conflict of interest because it provides a financial incentive for your financial professional to recommend particular investment products that offer additional compensation over those that do not.

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

Yes. Please visit www.investor.gov/CRS for a free and simple search tool to research Commonwealth and your financial professional. You may also search Commonwealth's and/or your financial professional's legal and disciplinary history at brokercheck.finra.org.

Commonwealth encourages you to ask your financial professional the following questions:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*
- *Who is my primary contact person? Are they 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?*

Your Commonwealth financial professional will provide you with their Form ADV Part 2B Brochure Supplement. You may also request a copy of your financial professional's ADV Part 2B Brochure Supplement by asking your financial professional or calling Commonwealth directly at the number below.

To receive a copy of Commonwealth's Form CRS: Client Relationship Summary, please visit the Clients tab on our website at www.commonwealth.com. For additional information about Commonwealth's brokerage or investment advisory services, ask your financial professional or call us at 866.854.0456.

LPL Financial LLC (LPL) Relationship Summary

Effective March 31, 2026

LPL (referred to as “we” or “us”) is registered with the U.S. Securities and Exchange Commission as a broker-dealer and an investment adviser. We have a network of financial professionals (“Professionals”) who offer brokerage and investment advisory services. Brokerage and investment advisory services, and the fees we charge for them, differ, and it’s important that you understand the differences. This

relationship summary will explain the various services we offer, how we charge for those services, and conflicts of interest that exist when we provide our services. To help you research firms and financial professionals, you can access free and simple tools at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Our Professionals offer brokerage services, investment advisory services, or both, depending on their licenses. Each Professional generally provides access to a range of investment products, such as stocks, bonds, exchange-traded funds (ETFs), mutual funds, annuities, and alternative investments. Please note that the range of investment options available to you may be limited depending on the licenses your Professional holds or if he or she is located at a financial institution that does not offer certain options. Your Professional or account program may also have specific

requirements, such as account or investment minimums. We encourage you to ask your Professional whether any investment limitations or account requirements apply.

If your Professional offers you both brokerage and advisory services, your Professional will inform you when he or she offers an investment recommendation or advice, and whether the recommendation or advice is part of a brokerage or advisory service. Some of the key differences between brokerage and investment advisory services are described below.

Brokerage Services

- Brokerage services include taking your orders and executing your securities transactions; making recommendations for you to buy, sell, or hold securities; and holding your securities for safekeeping (known as having “custody” of your securities).
- In most cases, we provide recommendations to you on specific investments, but you make the final investment decisions for your account. We also have a program available through a limited number of financial institutions in which you make investment decisions on your own without any recommendations from us.
- We don’t monitor brokerage account investments for you, unless we state otherwise in writing.
- We may provide brokerage services (but not investment recommendations) to you if your Professional is providing advisory services through a separate investment advisory firm.

Investment Advisory Services

- Some of the investment advisory services we offer include wrap fee programs and non-wrap fee programs; mutual fund asset allocation programs; advisory programs offered by third-party investment advisory firms; financial planning services; retirement plan consulting; investment research; digital advice programs; and other custom advisory services.
- You’ll typically grant us discretion to buy and sell investments in your account without asking you in advance. You may limit our discretion, such as by imposing reasonable restrictions on investing in certain securities or groups of securities. In other investment advisory accounts, you grant investment discretion to another financial institution.
- Some of our investment advisory accounts are nondiscretionary, which means you are required to preapprove each investment transaction that we recommend.
- We’ll typically monitor accounts, and specific investments within accounts, on an ongoing basis to align with your investment goals. However, in limited-scope consulting or advisory relationships, we won’t provide ongoing monitoring.

More detailed information about our advisory services can be found in the [Form ADV for your advisory program](#). Detailed information about our brokerage services can be found at [Brokerage Compensation Information and Related Conflicts of Interest](#). If viewing a paper version of this form, please visit lpl.com/CRS for hyperlinks to these documents.

Questions to ask your Professional:

- *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?

Investing is an individual journey, and we want to provide you with options. Below we outline the fees you could be charged for both brokerage and advisory accounts

depending on your investment choices. Fee Schedules for our brokerage and advisory programs can be found [on lpl.com](http://lpl.com).

Fees Associated with Brokerage Services

- For brokerage services, we charge a transaction-based fee (sometimes referred to as a commission) every time you buy or sell an investment. The amount you pay as a transaction-based fee varies according to the particular investment and amount invested. The more trades you make, the more transaction-based fees we earn. This creates an incentive to encourage you to trade often.
- For investments in stocks or ETFs, the transaction-based fee is usually charged as a separate commission or sales charge. For investments in bonds, this fee is typically included as part of the price you pay for the investment (called a markup or markdown).
- For investments in certain products like mutual funds, annuities, and alternative investments, we receive transaction-based fees from the investment product sponsor in the form of asset-based sales charges (e.g., sales loads). These fees are based on the amount invested in a product and, depending on the product, may be based on how long you hold the investment. Our receipt of asset-based sales loads creates an incentive to recommend products or sponsors that include such charges.

Fees Associated with Investment Advisory Accounts

- For investment advisory services, we typically charge an ongoing quarterly fee (sometimes referred to as an asset-based fee). This fee is a percentage of the value of your account. You pay this fee even if you don't buy or sell investments. The more assets you have in an asset-based fee account, the more you'll pay us in fees. This creates an incentive to encourage you to increase the size of your account, including by transferring or rolling over assets from other accounts. For some types of accounts, there is a per transaction charge in addition to an asset-based fee. We may also charge an hourly fee or fixed fee for additional services such as financial planning and consulting services that are of limited duration or nature.
- For wrap fee program accounts, you will pay us a single asset-based fee for advisory services. This fee also covers most transaction costs and certain administrative and custodial costs associated with your investments. If you expect to trade infrequently or to pursue a "buy and hold" strategy, a wrap fee program may cost you more than paying for the program's services separately, and you may want to consider a brokerage relationship rather than an advisory relationship.
- The fee you pay to your Professional is generally negotiated with him or her directly, and subject to different maximums, depending on the advisory program selected.

Other Fees and Costs

If applicable to your account, we'll charge you directly for other fees in addition to brokerage commissions and advisory fees, including: (1) account maintenance fees such as custody, trade confirmation processing, corporate actions, and transfer fees; (2) cash management fees such as cash sweep, checking, and wire fees; and (3) investment specific fees such as those for administration of alternative

investments or for foreign securities. See the Fee Schedules for our brokerage and advisory programs at lpl.com for more information. You should understand that these fees are not charged by us if your investment is in an account that is held directly with the sponsor, and not in an LPL investment account.

You may also incur fees charged by the particular investment product in which you are invested, including mutual funds, ETFs, and other pooled funds, in addition to brokerage commissions and advisory fees charged by us. Some of these fees may be shared, as described below in [Third-Party Payments](#). Certain investment products have significant fees triggered by particular events, e.g., annuities may include mortality, expense, and administrative fees, and fees for excessive transfers or early withdrawals.

You will also pay interest on any amount you borrow through securities-based loans.

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. Detailed information on our advisory fees can be found in the [Form ADV for your advisory program](#). Detailed information on our brokerage fees can be found at [Brokerage Compensation Information and Related Conflicts of Interest](#) and, depending on the investment product in which you invest, may be included in the product's prospectus or other offering document. If viewing a paper version of this form, please visit lpl.com/CRS for hyperlinks to these documents.

Questions to ask your 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 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 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 and investment advice we provide you. Here are some examples to help you understand what this means. If you have questions about whether any of these situations could apply to your investments, ask your Professional.

Third-Party Payments

We receive compensation from third parties related to investments you make in certain products, including mutual funds, ETFs, annuities, alternative investments, and other investments. This compensation includes ongoing distribution charges (e.g., 12b-1 fees or trail payments), which an investment product charges you and then pays to us. We also receive fees from investment products and/or their sponsors for recordkeeping and other administrative services we provide in relation to your investments. In some accounts we offer, uninvested cash is automatically placed into interest-bearing federally insured bank accounts. We receive fees for your participation in these “cash sweep” programs from the banks sponsoring the programs. The fees we receive are typically higher than the interest you earn on the cash held in the bank accounts and are in addition to any fees you pay to us. This creates an incentive for LPL if you maintain a cash balance in your account. [Revenue sharing payments](#) are another type of third-party compensation we receive from sponsors who participate in our marketing programs. These programs support our product marketing to our Professionals and for education and training efforts, and facilitate communications between sponsors and our Professionals. Finally, certain sponsors pay us to make their

investment products available on our platform. Because we receive payments from these third parties, there is an inherent incentive for us to recommend or invest your assets in those investment products. Detailed information regarding third-party payments can be found in the [Third-Party Compensation and Related Conflicts of Interest](#) document on lpl.com.

Principal Trading

In brokerage accounts, we sometimes directly buy from you or sell to you investments including bonds or certain shares of mutual funds, unit investment trusts (UITs), or alternative investments. These are called principal trades. If the principal trade involves a bond, we receive a markup or markdown by either buying the bond from you at a lower price than we will sell it for or by selling the bond to you at a higher price than we bought it for. That creates an incentive for us to either buy the bond from you at the lowest price possible or sell the bond to you at the highest price possible and maximize our profit on the principal trade. In advisory accounts, purchases of mutual funds, UITs, or alternative investments may be processed through our proprietary account, but we do not receive a markup or markdown in these trades. Also, in certain advisory accounts where a third-party investment advisory firm has discretion, we trade as principal and receive a markup or markdown.

Detailed information on our conflicts of interest can be found in the [Form ADV for your advisory program](#) and in [Brokerage Compensation Information and Related Conflicts of Interest](#). If viewing a paper version of this form, please visit lpl.com/CRS for hyperlinks to these documents.

Questions to ask your Professional:

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

How do your financial professionals make money?

Our Professionals are primarily independent contractors, although a portion are employees or employees of an affiliated company. The agreement between each Professional and LPL sets out the payments we make to them. Those who provide investment advisory services receive a portion of the advisory fee you pay. Professionals who provide you brokerage services receive a portion of the commissions or markups/markdowns from your trades. Receiving a portion of the advisory or brokerage fees you pay to us creates an incentive for them to encourage you to increase your investment account size or trade more frequently. We also compensate Professionals based on production, including payments based on the amount of client assets they service and the products they sell. In addition, our Professionals receive different levels of compensation for selling different types of investments or services. This could include, for example, a share of the 12b-1 fees, trail payments, a portion of the interest on securities-based loans or sales loads paid to us by an investment product. Although your Professional must recommend investment products or manage your account in your best interest, these additional forms of compensation create an incentive for them to recommend specific financial products.

Our Professionals may receive compensation from us in other ways, including:

- Transition assistance if he or she moves to LPL from another company. This assistance can include forgivable loans, advance payment of advisory fees, and/or waiving

or reducing other costs associated with transitioning the Professional's business. This assistance creates an incentive to migrate and maintain business on our platform from another investment platform, and to sell or recommend the sale of investments held in an account if we do not offer those investments.

- Waived or reduced costs and fees (e.g., for administrative services that we provide for your accounts, attending our conferences and events, and free or reduced-cost marketing materials). These waived and reduced costs and fees create an incentive for Professionals to associate with us instead of other financial firms.
- Equity awards in our parent company, LPL Financial Holdings Inc., which give your Professional an incentive to remain with us during the vesting period applicable to his or her stock holdings (the period of time before the stock is unconditionally owned). This also gives the Professional a financial interest in the success of our business.

Your Professional is legally required to act in your best interest and not put his or her interests ahead of your own. We have systems in place to mitigate the conflicts of interest that arise from the way he or she makes money, including systems to review whether a recommendation is in your best interest. More information on compensation can be found at [Brokerage Compensation Information and Related Conflicts of Interest](#). If viewing a paper version of this form, please visit lpl.com/CRS for a hyperlink to this document.

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

Yes. Visit Investor.gov/CRS for a free and simple search tool to research LPL and our Professionals.

Questions to ask your Professional:

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

Additional Information

Please visit [the Disclosures page on lpl.com](#) for more information, including a copy of the agreement for the account and/or program you are considering, the Form ADV Brochure for any advisory program you are considering, detailed information on our brokerage services under Brokerage Compensation and Related Conflicts of Interest, and more information regarding our brokerage and advisory programs under Third Party Compensation and Related Conflicts of Interest.

Please visit the Investor Regulatory & Educational Resources page on lpl.com to learn more about how to determine your investment objective and risk tolerance, among other items.

We are affiliated with other investment firms. If your Professional works with LPL Enterprise, LLC, you can find the relationship summary for that firm at lpl.com/lpl-enterprise.html. More information on our affiliations can be found in the [Form ADV for your advisory program](#).

If viewing a paper version of this form, please visit lpl.com/CRS for hyperlinks to cross-referenced documents.

To request up-to-date information or a copy of this relationship summary, please call us at (800) 558-7567.

We also encourage you to review the general information provided by the U.S. Securities and Exchange Commission regarding investing, choosing an investment professional, and related considerations, available by visiting Investor.gov.

Questions to ask your 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?*