

FORM CRS – CUSTOMER RELATIONSHIP SUMMARY

1. INTRODUCTION

Avisen Wealth Management, Inc. (“Avisen Wealth”) is a registered broker-dealer with the Securities and Exchange Commission (“SEC”) providing brokerage services. Avisen Advisors, LLC (“Avisen Advisors”) is a registered investment adviser with the SEC providing investment advisory services. Avisen Wealth and Avisen Advisors (“we”) are separate and affiliated companies under common control. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. 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 adviser, and investing.

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. Depending on your needs and investment objectives, we can provide you with services in a brokerage account, investment advisory account, or both at the same time. This document gives you a summary of the types of services we provide and how you pay. Unless otherwise advised, we will be acting in our capacity as a registered advisor of Brown Robello. Please ask us for more information.

2. WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

<i>Avisen Wealth- Broker-Dealer Services</i> Brokerage Accounts	<i>Avisen Advisors - Investment Adviser Services</i> Advisory Accounts
Types of Relationships and Services. <i>Our accounts and services fall into two categories.</i>	
<ul style="list-style-type: none"> • We offer full-service brokerage services, including buying and selling securities at your direction, making investment recommendations, education, research, and financial tools. The firm offers a variety of products including stocks, mutual funds, bonds, variable annuities, exchange traded funds (ETFs), options, certificates of deposit (CDs), alternative investments, and insurance products. We also offer retirement services, securities-based credit lines and margin lending (i.e. borrowing against the securities in your account). • We do not provide account monitoring services for brokerage accounts. We may voluntarily review your account to recommend an investment aligned with your investment goals. • In a brokerage account, you pay us a <i>transaction-based fee</i>, generally referred to as a commission, every time you buy or sell an investment. • Trade execution for purchase and sales of securities and custody of the assets in your account at a qualified custodian. • We do not act with discretion in brokerage accounts. You may select investments, or we may recommend investments for your account, but the ultimate investment decision to buy, sell or hold them as for your investment strategy and the purchase or sale of investments will be yours. • Cash Management services (including direct deposit, check writing, debit cards, electronic funds transfers) and access to our Cash Sweep 	<ul style="list-style-type: none"> • We offer investment advisory services, including advising investors on buying and selling investments, investment management services, investment strategies, financial planning and choosing investment managers. • If you open an advisory account, you will pay an on-going <i>asset-based fee</i> for our services. We will offer you advice on a regular basis. We will discuss your investment goals design with you a strategy to achieve your investment goals, and regularly monitor your account. We will contact you (by phone or e- mail) at least quarterly to discuss your portfolio. • You can choose an account that allows us to buy and sell investments in your account without asking you in advance (a “<i>discretionary account</i>”) or we may give you advice and you decide what investments to buy and sell (a “<i>non-discretionary account</i>”). • A proprietary product is one that is issued, sponsored or managed by us or our affiliate. We do not have proprietary products. • You will receive an account statement, at least quarterly, in paper or electronically. • Account minimums vary by service and can be found in our Form ADV, Part 2A, Items 4 and 5. Additional information about our advisory firm and services can be found in our Firm's Form ADV, Part 2A. You may request a copy from us or obtain a copy online at: https://adviserinfo.sec.gov/firm/brochure/113791

<p>Program where uninvested cash is swept into interest-yielding bank deposit accounts.</p> <ul style="list-style-type: none"> • You will receive an account statement, at least quarterly, in paper or electronically. • There is no minimum required to open a brokerage account. • A proprietary product is one that is issued, sponsored or managed by us or our affiliate. We do not have proprietary products. 	
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For additional information about the services we provide, visit our website: www.avisensecurities.com

<p>Questions to ask:</p> <ul style="list-style-type: none"> ○ <i>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?</i> ○ <i>How will you choose investments to recommend to me?</i> ○ <i>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</i>
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3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

3A. 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.

<i>Avisen Wealth - Broker-Dealer Services</i> Brokerage Accounts	<i>Avisen Advisors - Investment Adviser Services</i> Advisory Accounts
<ul style="list-style-type: none"> • Transaction-based fees. You will pay us a fee every time you buy or sell an investment. This fee, commonly referred to as a commission, is based on the specific transaction and not the value of your account. The more trades in your account, the more you pay us. As a result, we have an incentive to encourage you to trade more often in your account. • Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Also, with certain investments such as variable annuities, you may have to pay fees such as “surrender charges” to sell the investment. • Our fees vary and are negotiable. The amount you pay will depend, for example, on how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us. • We charge you additional fees, such as custodian fees, account maintenance fees, and account inactivity fees, wire fees, account transfer and/or termination fees, and margin interest. Select accounts are subject to certain additional fees and costs for services including cash management fees, if applicable. 	<ul style="list-style-type: none"> • Asset-based fees. You will pay an annual fee based on the total value of your advisory account either monthly or quarterly depending on your management agreement with us. The amount paid to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. We may also charge an hourly fee or a fixed fee for additional services such as financial planning. • For some advisory accounts, called <i>wrap fee programs</i>, the asset-based fee will include most transaction costs and custody services, and as a result wrap fees are typically higher than non-wrap advisory fees. We offer this investment product after the product provider has entered into agreements with us, and in certain situations, agree to make payments to us for compensation and revenue sharing. • Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. • The more assets there are in your investment advisory account, the more you will pay in fees, giving us a financial incentive to encourage you to increase the assets in your account. • For accounts not part of the wrap fee program, you will pay a transaction fee when we buy and sell an investment for you. You will also pay fees to a

<ul style="list-style-type: none"> • Trade confirmations and prospectuses provide information about the fees the costs of the products. • The more transactions in your account, the more fees you may pay us. From a cost perspective, you may prefer a brokerage account if you do not trade often or if you plan to buy and hold investments for longer periods of time. 	<p>broker-dealer or bank that will hold your assets (called “custody”).</p> <ul style="list-style-type: none"> • Paying for a wrap fee program could cost more than separately paying for advice and for transactions if there are infrequent trades in your account. An asset-based fee may cost more than a transaction-based fee, but you may prefer an asset-based fee if you want continuing advice or want someone to make investment decisions for you. You may prefer a wrap fee program if you prefer the certainty of an annual fee regardless of the number of transactions you have. • Additional information about our fees, costs and/or conflicts can be found in our Form ADV, Part 2A.
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Information and fee schedule for our brokerage and advisory accounts are available at [Avisen Account Fees](#) website link.

Questions to ask:
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?

3B. 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:

Avisen Wealth – Broker-Dealer Services Brokerage Accounts	Avisen Advisors – Investment Adviser Services Advisory Accounts
<ul style="list-style-type: none"> • We can make extra money by selling you certain investments that pay more. • We are also an insurance broker or agent. This is a conflict of interest because we receive additional compensation for providing these other services to you. We have an incentive to recommend and provide these other services to you. • Trail Compensation is ongoing compensation from product sponsors typically paid from the assets of an investment product based on an annual percentage of invested assets and varies by product. We therefore have an incentive to recommend products that pay higher “trails” and to encourage you to increase the size of your investment. This creates a conflict of interest. • Avisen Wealth has an affiliated registered investment adviser with the SEC. Our brokerage and advisory services have different compensation and incentive structures. These differences may create a conflict between our interest and yours when recommending a type of program. 	<ul style="list-style-type: none"> • You may pay more in asset-based fees than you would in brokerage commissions by having an investment advisory account rather than a brokerage account. This can create a conflict of interest. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them.

<ul style="list-style-type: none"> • We currently do not engage in revenue sharing or principal trading. • While we will take reasonable care in developing and making recommendations to you, securities involve risk, and you may lose money. There is no guarantee that you will meet your investment goals, or that our recommended investment strategy will perform as anticipated. Please consult any available offering documents for any security we recommend for a discussion of risks associated with the product. We can provide those documents to you, or help you to find them. 	
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Questions to ask:
How might your conflicts of interest affect me, and how will you address them?

3C. How do your financial professionals make money?

Our Firm’s financial professionals are compensated based on a percentage of revenue (either from broker-dealer commissions and mutual fund trail commissions or asset-based fees derived from investment advisory services or recommendations) generated from the sales of products and/or investment advisory services to clients. This compensation varies by product, and financial professionals may be incentivized to recommend products that have higher fees and/or ongoing payments.

Your financial advisor’s compensation creates conflicts of interest when:

- Providing advice on trades, investments types, rollovers or transfers, withdrawals, margin loans and other services.
- Helping you choose one service over another. A financial advisor typically earns more in upfront fees and commissions through brokerage services and more over time through investment advisory services.

While such conflicts exist, we have policies and review processes designed to mitigate these conflicts.

<i>Avisen Wealth - Broker-Dealer Services Brokerage Accounts</i>	<i>Avisen Advisors - Investment Adviser Services Advisory Accounts</i>
Your financial advisor receives a portion of the commissions, or sales charges you pay when you make trades. He or she also receives a portion of the ongoing service fees or trail commissions we get from mutual funds and annuities.	Your financial advisor receives a portion of the ongoing fees you pay us based on assets in your account. He or she also receives a portion of fees received from select third-party money manager the firm has allocated assets.

4. DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

Yes. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals. For additional information about our brokers and services, visit <https://brokercheck.finra.org/>.

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

5. ADDITIONAL INFORMATION

You may find a copy of this Form CRS Relationship Summary, as well as, additional information about our brokerage and/or investment advisory services, at our website www.avisensecurities.com. You may also contact us at info@avisensecurities.com or call (916) 480-2747 for a copy or to request up-to-date information.

Questions to ask:
Who is the primary contact person for my account? Is he or she a registered representative of a broker-dealer? If I have concerns about how this person is treating me, who can I talk to?

FORM CRS EXHIBIT

August 25, 2022

Summary of Material Changes Avisen Wealth Management, Inc. – Broker-dealer Avisen Advisors, LLC – Investment Adviser

Below is a summary of the changes since our last Form CRS update dated March 2021:

- Effective August 22, 2022, the legal name and primary business name for Avisen Securities, Inc. was changed to Avisen Wealth Management, Inc.
- Effective July 20, 2022, the legal name and primary business name for Brown Robello Capital Management, LLC was changed to Avisen Advisors, LLC.