

Mutual Trust Asset Mgmt., Inc.

Client Relationship Summary

August 3, 2026

Mutual Trust Asset Management, Inc. ("MTAM") is registered with the Securities and Exchange Commission as an Investment Adviser. and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ, and it is important for you, our client, to understand the differences. Additionally, 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 broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me? We offer portfolio management services to retail investors: Detailed information regarding our services, fees and other disclosures can be found in our [Form ADV Part 2A Items 4, 5, 7, and 8](#).

Account Monitoring: If you open an investment account with our firm, as part of our standard service we will monitor your investments at least on an annual basis.

Investment Authority: We manage investment accounts on a **discretionary** basis whereby **we will decide** which investments to buy or sell for your account. We have discretion to select, retain or replace third-party managers to manage your accounts. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. We also offer **non-discretionary** investment management services whereby we will provide advice, but **you will ultimately decide** which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Investment Offerings: We offer advice on individual securities, exchanged traded funds (ETF's) or mutual funds (load- waived or no-load). Investments may also include equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, mutual funds shares and U. S. government securities. Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Account Minimums and Requirements: In general, we require a minimum account size to open and maintain an advisory account, which may be waived at our discretion.

Conversation Starters Ask your financial 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?

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What fees will I pay? The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6.

- **Asset Based Fees** - Payable quarterly in advance. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets.
- **Performance-Based Fees** - We charge Performance-Based Fees for qualified clients on a negotiated basis which creates on conflict as we will have an incentive to choose better performing assets for the performance fee-based accounts
- **Commissions** - Persons associated with DPM are registered representatives of an affiliated broker/dealer, Calton & Associates, Inc. If you purchase securities through these persons a commission will be charged.
- **Other Advisory Fees**
 - Advisory fees charged by third party money managers, which are separate and apart from our fees.

Examples of the most common fees and costs applicable to our clients are:

- Custodian fees;
- Fees related to variable annuities, including surrender charges.
- Account maintenance fees;
- Fees related to mutual funds and exchange-traded funds;
- Transaction charges when purchasing or selling securities; and
- Other product-level fees associated with your investments

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. Additional information on our fees can be found in MTAM's t's ADV Part 2A brochure Item 5 Fees and Compensation and our advisory agreements.

Conversation Starters

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.?

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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 provided you with a recommendation as your investment adviser, we must 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.

Examples of Ways We Make Money and Conflicts of Interest.

- Persons providing advice on behalf of our firm are registered representatives with our affiliated broker/dealer Calton & Associates, Inc. These persons receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs.
- Certain persons associated with MTAM are separately licensed as certified public accountants and/or independently own a registered investment adviser. Our advisory services are separate and distinct from the compensation paid for accounting services.
- We are affiliated with PeakShares LLC, a registered investment adviser through common control and ownership. Certain related persons of our firm will be registered as investment adviser representatives of PeakShares LLC. PeakShares LLC acts as the investment adviser to a publicly traded registered investment company under the Investment Company Act of 1940, PeakShares Sector Rotation ETF (“ETF”). Certain related persons of our firm, including owners, officers, and/or investment adviser representatives, also serve in the same or a similar capacity for PeakShares and/or the ETF. The compensation of these related persons may be based, in part, upon the profitability of the ETF. This affiliation presents a conflict of interest because our affiliates benefit if our advisors recommend the ETF.
- Our clearing firm administers a Bank Insured Deposit Program (“Program”). The Bank Insured Deposit Program is an FDIC-insured account that sweeps excess cash to participant banks in increments of \$250,000, to achieve FDIC insurance coverage. A sweep of customers’ excess cash allows them to earn interest on those funds while retaining the flexibility to quickly access that cash to purchase securities or withdraw it. Our clearing firm makes money on customers’ excess cash it places with program banks. Our clearing firm shares a portion of the money it makes from the Program with our affiliated broker/dealer Calton & Associates.

Refer to our [Form ADV Part 2A](#) to help you understand what conflicts exist.

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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?

The investment Adviser Representatives servicing your account(s) receive a percentage of fee revenue for providing advisory services. The percentage of revenue paid to your financial professional may increase based on certain revenue thresholds. They may also be compensated in the form of salary, bonuses, and product sales commissions.

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

Yes. our firm or our financial professionals currently have legal or disciplinary history to disclose. These events are disclosed in either our Form ADV or the specific individual's Form U4. Please visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals. Please also see the Form ADV Part 2 B for the Investment Adviser Representatives of MTAM, which can be found at <https://adviserinfo.sec.gov/firm/brochure/121364>

Conversation Starters

Ask your financial professional:

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

For additional information about our investment advisory services, see our website at www.Calton.com or call us at 813-264-0440

Conversation Starters

Ask your financial professional:

Who is my primary contact person?

Is he or she a representative of an investment advisor or a broker dealer?

Who can I talk to if I have concerns about how this person is treating me?