

Manhattan West Asset Management, LLC  
FORM CRS – CUSTOMER RELATIONSHIP SUMMARY

April 27, 2021

<p>Item 1. <u>Introduction</u></p>	<p>Manhattan West Asset Management, LLC (“MWAM”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. 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 <a href="http://Investor.gov/CRS">Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<p>Item 2. <u>Relationships and Services</u></p>	<p style="text-align: center;"><b>What investment services and advice can you provide me?</b></p> <p>We provide individuals and institutions with a wide array of investment advisory services. We provide asset management through wrap portfolios, financial planning, investment consulting and retirement plan consulting services for many different types of clients to help meet their financial goals while remaining sensitive to risk tolerance and time horizons.</p> <p style="text-align: center;"><b>Monitoring</b></p> <p>As a part of our comprehensive wrap portfolio management service, once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and rebalanced based upon the client’s individual needs, stated goals and objectives. Retirement plan consulting clients receive reviews of their retirement plans for the duration of the service.</p> <p style="text-align: center;"><b>Investment Authority</b></p> <p>We generally have discretionary authority to manage securities accounts on behalf of our clients. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our written acknowledgement. Although we have trading authorization for our Non-Wrap Accounts, we will not execute any trades in such accounts without verbal authorization from such clients. You have the ability to customize your portfolio and to articulate a preference for investing or not investing in certain business types, sectors, etc.</p> <p style="text-align: center;"><b>Limited Investment Offering</b></p> <p>We provide a variety of portfolio management, financial planning and consulting services to clients for the management of financial resources based upon an analysis of current situation, goals, and objectives. For qualified investors, we may recommend investment in private investment funds offered by our affiliates. We do not offer advice or make available a limited menu of products or types of investments.</p> <p style="text-align: center;"><b>Account Minimums and Other Requirements</b></p> <p>We require a minimum account balance of \$3,000,000 for our Comprehensive Wrap Portfolio Management service. Written financial plans are generally assessed a minimum fee of \$15,000. At our discretion, we maintain the right to waive any fees or accept accounts below the stated minimum.</p> <p><b>Additional information</b> about MWAM services is available on Part 2 of our Form ADV, which is available at <a href="https://adviserinfo.sec.gov/firm/summary/283630">https://adviserinfo.sec.gov/firm/summary/283630</a>.</p> <p><b>Conversation Starters.</b> Ask your financial professional—</p> <ul style="list-style-type: none"><li><input type="checkbox"/> <b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li><li><input type="checkbox"/> <b>How will you choose investments to recommend to me?</b></li><li><input type="checkbox"/> <b>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</b></li></ul>
<p>Item 3. <u>Fees, Costs, Conflicts, and Standard of Conduct</u></p>	<p><b>A. What fees will I pay?</b></p> <p>MWAM’s wrap fee program fees are negotiable, and the maximum annual fee charged for this service will not exceed 2.00% of account assets under management. Annualized fees are billed on a pro-rata basis quarterly in advance. Asset-based fees associated with the wrap fee program will include most transaction costs and fees to a broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee. The more assets there are in an investor’s advisory account, the more an investor will pay in fees, and WMAM may therefore have an incentive to encourage the investor to increase the assets in his or her account</p> <p>For financial planning and consulting services, we charge on an hourly or flat fee basis. The maximum hourly fee rate to be charged will not exceed \$500. Flat fees range from \$15,000 to \$50,000. Retirement plan consulting services are billed on a percentage of plan assets under management, with the maximum annual fee not to exceed 1.00%. Additional information about our firm’s fees are included in Item 5 of Part 2 of Form ADV, available at <a href="https://adviserinfo.sec.gov/firm/summary/283630">https://adviserinfo.sec.gov/firm/summary/283630</a>.</p> <p>In addition to the above, clients also bear fees to the broker-dealer or bank that maintains each account (called “custody” fees). Non-Wrap Accounts are not charged a transaction fee, but any transaction costs are borne by the</p>

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	<p>client and are deducted directly by the custodian from the client’s account. Clients may also pay charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund’s prospectus. Investors in private investment funds offered by our affiliates are charged, in general, annual or for certain funds one-time management fees based on the investors contributed capital, and also for certain funds performance-based fees.</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><b>Conversation Starter.</b> Ask your financial professional—</p> <p><input type="checkbox"/> <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></p>
<p>Item 3. <u>Fees, Costs, Conflicts, and Standard of Conduct</u></p>	<p><b>B. 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?</b></p> <p><b>When we act as your investment adviser,</b> 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 to you. Here are some examples to help you understand what this means.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> We manage accounts for multiple clients, and we allocate our time based on each client’s needs. Our firm earns more as we expand our client base and grow our assets under management, and we seek to balance our staffing with the individualized needs of each client.</li> <li><input type="checkbox"/> Charles Schwab &amp; Co, Inc. makes available to us other products and services that benefit us but may not directly benefit our clients or their accounts.</li> <li><input type="checkbox"/> Some personnel of our firm are licensed insurance agents. We are affiliated with Manhattan West Insurance Services, LLC (California Department of Insurance License# 0M20440), which may receive compensation based upon its placement of term and whole life insurance policies.</li> <li><input type="checkbox"/> Affiliates of MWAM earn management fees and performance-based fees on the assets in the private investment funds which we recommend for investment to certain of our clients.</li> <li><input type="checkbox"/> We choose subadvisers to provide investment advisory services to Client accounts.</li> </ul> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <p><input type="checkbox"/> <b>How might your conflicts of interest affect me, and how will you address them?</b></p> <p><b>Additional information</b> about conflicts of interest between MWAM and its clients is available on Part 2 of our Form ADV, which is available at <a href="https://adviserinfo.sec.gov/firm/summary/283630">https://adviserinfo.sec.gov/firm/summary/283630</a>.</p> <p><b>How do you or your financial professionals make money?</b> MWAM’s financial professionals receive a salary, a percentage of wrap program fees, and may receive a discretionary bonus. Compensation is set with the intention of attracting and retaining highly qualified professionals. Compensation is based on a variety of factors, including the number, value and complexity of accounts under management, the performance of those accounts, and client satisfaction and retention.</p>
<p>Item 4. <u>Disciplinary History</u></p>	<p><b>Do you or your financial professionals have legal or disciplinary history?</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Visit <a href="http://Investor.gov/CRS">Investor.gov/CRS</a> for a free and simple search tool to research us and our financial professionals.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <p><input type="checkbox"/> <b>As a financial professional, do you have any disciplinary history? For what type of conduct?</b></p>
<p>Item 5. <u>Additional Information</u></p>	<p><b>Additional information about our services</b> can be found at <a href="https://adviserinfo.sec.gov/firm/summary/283630">https://adviserinfo.sec.gov/firm/summary/283630</a>. If you have any questions about the contents of this brochure or would like to request a copy of this relationship summary, please contact us at (310) 341-4585 or <a href="mailto:bryan@mwestasset.com">bryan@mwestasset.com</a>.</p> <p><b>Conversation Starter.</b> Ask your financial professional—</p> <p><input type="checkbox"/> <b>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?</b></p>