

# Walsky Investment Management

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Form ADV Part 3

3/30/22

## Item 1: Introduction

We are registered with the SEC as an investment adviser. Brokerage and investment advisory fees differ, and it is important for you to understand the differences. Free and simple tools are available to research advisory firms and financial professionals at <http://investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers and investing.

## Item 2: Relationships and Services

### What investment services and advice can you provide me?

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A (“Disclosure Brochure”). Our services include portfolio management for individuals, businesses, and company pension and profit-sharing plans. As part of our standard services, the Firm develops an individual investment plan for each client through personal discussions about goals and objectives and reviews the client’s preferences and circumstances to create a portfolio based on those goals. The firm performs ongoing reviews of the portfolio to ensure they continue to align with clients’ profiles. There are no material limitations to our monitoring. We require discretionary authority to implement the recommended transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. Walsky Investment Management charges a fee based on a percentage of the assets under management.

Our investment adviser representatives are registered advisers with the state(s) in which they conduct business. Please refer to the firm’s Brochure Supplement-Part 2B of Form ADV for specific education, experience and qualifications of each of our professionals.

### How will we choose investments to recommend for your account?

We offer advice to each Client through portfolios, each individualized for the client based on their goals and circumstances. Client portfolios are managed by our adviser representatives. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client’s individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background. Account supervision is guided by the client's stated objectives (i.e., growth, income, or growth and income), as well as tax considerations.

Conversation starters: We encourage you to ask your investment adviser these key questions:

- (1) Given my financial situation, should I choose an investment advisory service? Why or why not?
- (2) How will you select investments under your discretionary authority?
- (3) What is your relevant experience and educational background in the financial services business? What do your qualifications mean?

## Item 3: Fees, Costs, and Standards of Conduct

### What fees will I pay?

The fees for all clients are based on a percentage of the assets under management. Our investment management fees are billed quarterly, in advance. The firm invoices a new client once the account has begun to be managed and quarterly thereafter. As your investment adviser, we have to act in your best interest and not put our interest ahead of yours.

**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.**

Other costs incurred in your account may include wire transfer and electronic fund transfer fees, and fees and taxes on brokerage accounts and securities transactions. We do not collect any fees or revenue from these products.

What are our legal obligations to you as an investment adviser?

**When we act as your investment adviser**, we act in a fiduciary capacity. This means 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 interest. 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.

Example: Walsky Investment Management may have a potential conflict of interest when we recommend the rollover of retirement plan assets to an IRA that would be managed by us.

How might our conflicts of interest affect you and how will we address them?

Because our firm would receive additional business when we recommend you rollover assets from a retirement plan to an IRA, a potential conflict exists when we make this recommendation. However, our internal policies and compliance procedures provide guidance to manage your account in accordance with your best interest regardless of this conflict. Recommendations will always be based on the individual circumstances and objectives of the client.

Conversation starter: If you have any questions concerning our fees or conflicts of interest, please feel free to ask us questions, such as: “How may your conflicts of interests or fee structure affect me, and how will they be addressed?”

#### **Item 4: Disciplinary History**

Do we or our financial professionals have legal or disciplinary history?

No. We encourage you to visit [investor.gov/CRS](http://investor.gov/CRS) for a free and simple search tool to research our firm and any of our financial professionals.

Conversation starter: Feel free to ask: “As a financial professional, do you have any disciplinary history? For what type of conduct?”

#### **Item 5: Additional Information**

Where is additional information available?

You should independently confirm all of the information stated here with our other regulatory filings. For additional information on our investment advisory services, see our Form ADV, along with the brochure supplement on each of our financial professionals, on IAPD at [adviserinfo.sec.gov](http://adviserinfo.sec.gov). Information regarding our firm can be found at [Investor.gov](http://Investor.gov) or by calling our firm at the telephone number listed below for up-to-date information. If you have a problem with your investments, investment account or a financial professional, contact us in writing at the address listed above. If you fail to gain timely satisfaction through this course of action, you may wish to report the problem to the SEC at [Investor.gov](http://Investor.gov) or call the toll-free investor assistance line at 800-732-0330.

Conversation Starter: 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? Our Firm and its representatives have a fiduciary duty to all clients. Please call us at 610-670-6918 if you have any concerns.

To obtain additional information regarding our services, if you want to address any concerns, or if you need to request a copy of this relationship summary or any of our other disclosure documents referred to in this document, please contact the firm at 610-670-6918.