

Stansberry Asset Management, LLC
Client Relationship Summary
June 30, 2020

1. Introduction

Our name is Stansberry Asset Management, LLC (“SAM”). We are registered with the Securities and Exchange Commission as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

2. Relationships and Services

What investment services and advice can you provide me? We offer investment advisory services to retail investors. The principal investment advisory service that we offer to retail investors is through separately managed accounts (“accounts”) for predominately high net worth individuals. There are no material limitations on our services, and clients are offered the opportunity to choose between a number of different investment strategies and can select a strategy or combination of strategies that best fits their needs. We monitor your investments on a continuous basis as part of our standard services. Our investment management agreement with you gives us the authority to buy and sell investments on your behalf, however, in some instances, clients may impose restrictions on investing in certain securities or certain types of securities. While we generally focus on publicly traded equities and credit (including investment grade, high yield, and government bonds), our advice is not limited to certain types of products or investments. We typically require a minimum relationship size of \$500,000 to open an account with us. ***Please see the more detailed disclosure on the investment services and advice that we can provide to you in Items 4 and 7 of our Form ADV Part 2A, which is available [here](#).***

Conversation Starters. *Given my financial situation, should I choose an investment advisory service? 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?*

3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay? Clients typically pay us an asset-based fee ranging from 0.75% to 1.75% of the net assets in its account each year. Because we charge you an asset-based fee, the more assets there are in your advisory account, the more you will pay in fees, and we therefore have an incentive to grow your account and to encourage you to increase the assets in your account. Clients also pay other investment expenses such as custodial charges, brokerage fees, other transaction costs, commissions and related costs; interest expenses; taxes, duties and other governmental charges; transfer and registration fees or similar expenses; costs associated with foreign exchange transactions; other portfolio expenses; and costs, expenses and fees associated with products or services that may be necessary or incidental to such investments or accounts. Client assets may be invested in exchange traded funds or other registered investment companies. In these cases, the client will bear its pro rata share of the investment management fee and other fees of the fund, which are in addition to any fees or other compensation paid to us. 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. Please see the more detailed disclosure on our fees and costs in Item 5 of our Form ADV Part 2A, which is available [here](#).***

Conversation Starters. *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 acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? *When we 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 investment advice we provide you. Here are some examples to help you understand what this means. The following arrangements and activities give us an incentive to make investments for you based on our own interests rather than on your needs.*

- ***Third-Party Payments.*** SAM may receive certain fees from private funds or other investment opportunities sponsored by organizations that SAM has partnered with in exchange for providing services related to back office and investor relations activities, among other general business consulting services. We do not invest

assets from client accounts in these funds, but because we receive fees from the private funds, we have an incentive to suggest that clients consider investing in the private funds.

- **Broker Selection.** SAM has a duty to obtain best execution on your transactions. When we choose which broker-dealer to execute your transactions, we consider, among other items, the services, products, and research that we receive from broker-dealers.
- **Personal Trading.** From time-to-time, SAM employees may wish to personally invest in the same (or related) securities that we are buying for you. This could give us an incentive to favor our own accounts over your account. To help protect clients, SAM employees are required to abide by a Code of Ethics that requires them to place the interests of their clients before their own interests. **Please see the more detailed description of our Code of Ethics in Item 11 of our Form ADV Part 2A, which is available [here](#).**

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

Please see the more detailed disclosure on our conflicts of interest in Items 5, 10, 11, 12, 14, and 17 of our Form ADV Part 2A, which is available [here](#).

How do your financial professionals make money? We pay our financial professionals a base salary and a discretionary cash bonus. In addition, certain financial professionals that are members of our firm or our affiliates may also be entitled to a portion of our net profits. Our financial professionals are not compensated based directly on the performance of any client account. However, because certain financial professionals receive a portion of our net profits based on their ownership shares, such financial professionals' compensation typically will increase as our assets under management increase.

4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No. Visit www.Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

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

5. Additional Information

You can find additional information about our investment advisory services on the [SEC's website](#) and on our [website](#). You can request up to date information and a copy of our relationship summary by contacting us at 646-854-4596.

Conversation Starters. *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?*

Links referenced in the Form CRS:

SAM Form ADV Part 2A:

https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=719591

SEC's website: <https://www.sec.gov/>

SAM's website: <https://www.stansberryam.com/>