

Golden State Asset Management Form CRS

March 2024

Introduction

Golden State Asset Management, LLC, is a federally registered investment adviser with the United States Securities and Exchange Commission (SEC). 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.

What investment services and advice can you provide me?

We offer two different services to retail investors. Under the *Stella Nova* wrap fee program, we offer a digitally automated portfolio management service to retail investors for a single bundled fee. We manage your assets on a discretionary basis and therefore, our decisions to buy and sell securities in your accounts do not require your express approval. If you choose to utilize this Service, you are granting us authority to conduct trading in enrolled accounts by investing varying combinations of ETFs and other securities in the equity, fixed income, hedged equity, and cash asset categories, although we will have the ability to add or remove asset categories as we see fit in our discretion. Under this program, we work with you to understand your risk tolerance, investment goals and objectives and then position you in the investment strategy that we find is suitable given the information you provide. The investment recommendations provided by *Stella Nova* are highly dependent on the information provided by you. We provide daily monitoring of your investments and periodic rebalancing of your account(s) is performed by our trading team with assistance from software and with oversight from the GSAM Investment Committee. Second, GSAM offers sub-advisory services to other registered investment advisers (“RIAs”) and indirectly, to their retail clients. Under this program, on a discretionary basis, GSAM will implement our strategies directly, and place trades in clients’ separate account(s). When providing such services, GSAM enters into separate, written sub-advisory agreements with each adviser. Subject to our approval, you may be able to place a variety of restrictions on our discretionary investment activity, including the types of securities permitted, the credit ratings allowed, and the liquidity of the account.

Our investment management services are open to all retail clients, including individuals, high net worth individuals, trusts, estates, charitable organizations, and limited liability companies. With the exception *that Stella Nova* accounts must be maintained at TD Ameritrade, we currently impose no other requirements for enrolling and maintaining accounts in our program(s). There is currently a \$20,000 minimum to participate in the *Stella Nova* ETF models but no minimums for the *Stella Nova* Mutual Fund models or the GSAM sub-advisory services. For additional information, please refer to the Firm Brochure and/or the *Stella Nova* Program Brochure at <https://adviserinfo.sec.gov/firm/brochure/299649>.

Conversation Starters: We recommend that you consider these questions before choosing any financial services. Answers to the conversation starters may be found at <https://mystellanova.com/conversation-starters>, but clients in the sub-advisory program may contact their financial professional.

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?

What fees will I pay?

Under the *Stella Nova* program, your wrap fee will be calculated across all assets within the enrolled account, including cash positions. Your enrolled accounts are responsible for paying *Stella Nova* an annual wrap advisory fee of 0.25% to 0.40% billed on a pro-rata basis quarterly in advance based on the value of the account(s) on the last day of the previous quarter. The fee referenced may be waived at the Firm’s discretion. In addition, for Mutual Fund Portfolios, there is a \$100 yearly account fee to be billed at \$25/quarter. Our sub-advisory fees do not exceed 0.55% of assets under management, annually. The fees we charge do not include, or may be a part of, other costs you will likely pay to third parties, including but not limited to

transactional fees, custodian fees, index fees, or fees you pay to a third-party intermediary such as a financial advisor, wrap program sponsor, or broker-dealer. Unless we enter into a direct investment management agreement with a client, our fees typically can be negotiated only between us and your primary investment adviser, who determines how our fees are paid, including the level and frequency of payment. Your total advisory fee will likely range between 1% to 2.5% of the total assets under management. Under both programs, the more assets you have with GSAM, the more you will pay in fees. In addition, our custodians may provide order flow payment for transaction routed to their firm for execution. For additional information, please refer to the Firm Brochure and/or the *Stella Nova* Program Brochure at <https://adviserinfo.sec.gov/firm/brochure/299649>.

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.

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.

- Our firm is under common ownership and serves as a sub-advisor to our industry affiliates, Golden State Wealth Management and Golden State Equity Partners.
- Certain firm personnel are registered representatives of LPL Financial, a registered broker-dealer and a conflict exists if such persons receive compensation in connection with the purchase of securities or other investment products.
- When trading, we are incentivized to favor larger clients, and clients who pay a higher fee rate.

For additional information, please refer to the Firm Brochure and/or the *Stella Nova* Program Brochure at <https://adviserinfo.sec.gov/firm/brochure/299649>.

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

How do your financial professionals make money?

Our professionals, including both equity owners and salaried employees are ultimately compensated through the firm's general revenue, which is in turn based on the ongoing management fees charged by our investment advisory programs. As a result, we have an incentive to encourage you to increase the amount of assets we manage. The firm does not charge performance fees.

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

Yes. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

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

Additional Information

For additional information about our services, including up-to-date information about the firm and/or a copy of this disclosure, please call visit our website at <http://www.MyStellaNova.com> or you can contact us at 866-895-6040. Clients participating in the sub-advisory program may visit the GSAM website at <http://www.teamgoldenstate.com>.

Who is my primary contact person? Is he or she a representative of an investment adviser or broker dealer? Who can I talk to if I have concerns about how this person is treating me?