

[Confluence Wealth Services, Inc.](#) (“Confluence,” “we,” “us,” “our” “firm”) is registered with the [U.S. Securities and Exchange Commission \(“SEC”\)](#) as an Investment Adviser. Brokerage and investment advisory services and fees differ. It is important for a retail investor to understand the 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 advisers, and investing.

WHAT INVESTMENT SERVICE AND ADVICE CAN YOU PROVIDE ME?

Confluence offers wealth management services to retail investors including financial planning, investment management and insurance services. Our investment management services include Separately Managed Account Services (including Target Allocation and Individually Managed Portfolios, Managed Stock Portfolios, and Third-Party Managers) and Confluence Compass Services. We manage products including mutual funds, exchange-traded funds (“ETFs”), equities, options, and fixed income securities. Under a Wealth Management Agreement (“WMA”), our services include ongoing monitoring of your investment portfolio. We manage accounts on either a discretionary or non-discretionary basis.

Discretionary management means that we will be authorized by you to make investment decisions, and we will buy and sell the securities we have recommended to you. Non-discretionary management means you as the investor make the ultimate decision whether to purchase or sell the securities recommended to you. These services include periodic reviews at the client’s request. Confluence does not limit its recommendations and investment services to proprietary products or specific types of securities. Confluence does not require an account minimum to engage our services. For more detailed information about our services, refer to our [Form ADV 2A Brochure](#).

Suggested Questions to Ask Your 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?

Description of Principal Fees and Costs: Clients pay fees based on the types of services they select. We typically charge fee-based compensation that is calculated based on the value of the client’s assets under management. Fees are outlined in the WMA you enter into with Confluence and may be negotiated based on the nature of the services being provided and the complexity of each client’s circumstances. Fees based on assets under management typically range from 0.20% to 1.50% annually.

Clients are billed quarterly in advance based on the aggregated value of all accounts as described in the client’s agreement as of the last day of the prior quarter. Advisory fees are prorated based on the number of days that the Account(s) are open during the quarter. The first payment is due upon the end of the calendar quarter in which the account is fully invested and will be prorated and calculated based upon the value of the Client’s account at the end of that quarter. The more assets a retail investor’s advisory account holds, the more an investor will pay in fees, and we may therefore have an incentive to encourage the investor to increase the assets in their account.

For Managed Stock Portfolios, you will pay an active management fee of 0.25% in addition to the advisory fee you pay to Confluence, as outlined in your WMA. For third-party money manager services, you will pay a fee to the third-party manager, which varies up to a maximum of 0.65%. This fee is also in addition to the advisory fee you pay to Confluence. For any households held on the Raymond James Platform, Confluence will charge an annual minimum fee of \$1,000. This fee does not apply if, at the end of a quarter, the annualized fee for the entire household is greater than \$1,000.

Description of Other Fees and Costs: All fees paid to Confluence are separate and distinct from the fees and expenses that may be charged by other parties (including separate account managers, mutual funds, and ETFs). Other fees charged to you that are related to your account are fees paid to the custodian and broker, fees related to mutual funds, ETFs, and transactional fees.

Additional Information 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. The fees for investment advisory services are described in further detail in our Firm’s ADV, in particular, [Part 2A brochure, Items 5.A., B., C., and D.](#)

 ***A Suggested Question to Ask Your Financial Professional***

- Help me understand how these fees and costs 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.

Some Confluence financial professionals are Licensed Insurance Agents. This creates an incentive to recommend these services to clients in order to generate additional compensation.

For more detailed information regarding conflicts of interest, please see our [Form ADV, Part 2A brochure](#).

 ***A Suggested Question to 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?

Confluence professionals are paid a salary and receive non-cash compensation in the form of an employee benefit package.

- Financial professionals receive a portion of the advisory fees you pay. As a result, your financial professional is incentivized to encourage you to increase the amount of assets in your account(s).
- Financial professionals, who are also insurance agents, can offer you insurance products from unaffiliated providers and receive commissions and other related revenues for the sale of such products. They can also refer you to Confluence Insurance Services in which they may receive a referral fee based on the commission received from Confluence Insurance Services.

Other factors that affect how much our financial professionals are paid include: the amount of client assets they service; the revenue received for financial advisory conducted by the financial professional; and the time and complexity required to meet a particular clients' financial needs and objectives.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No, for our Firm. Yes, for our financial professionals. Please see Investor.gov/CRS for a free search tool to research Confluence and our financial professionals.

 ***A Suggested Question to Ask Your Financial Professional***

- As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

ADDITIONAL INFORMATION

You may also find additional information about Confluence and your financial professional on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Please call us at (412) 391-0377 for up-to-date information about our services or to request a copy of our relationship summary.

 ***Suggested Questions to Ask Your Financial Professional***

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