

**CONFLUENCE WEALTH SERVICES, INC.**  
**CLIENT RELATIONSHIP SUMMARY March 2021**

---

[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 SERVICES AND ADVICE CAN YOU PROVIDE ME?**

Confluence offers investment advisory services to retail investors including financial planning, consulting, and wealth management. We manage products including: mutual funds, exchange-traded funds (“ETFs”), equities, options, and fixed income securities. Under a Wealth Management Agreement, our service includes 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](#).

**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 receive fee-based compensation that is calculated based on the value of the assets under management in the client’s account. Fees may be negotiated based on the nature of the services being provided and the complexity of each client’s circumstances. Assets Under Management fees typically range from .25% to 1.25% annually. Retail Investors are billed in advance or arrears on a monthly or quarterly basis. 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.

**Description of Other Fees and Costs:** 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** Some of our financial professionals are registered representatives of a registered broker-dealer. Registered representatives can offer you brokerage services through this broker-dealer or investment advisory services through Confluence. Brokerage services and investment advisory services are different, and the fees we, and the broker-dealer, charges for those services are different. It is important that you understand those differences. In particular, registered representatives earn additional transaction-based compensation and have additional conflicts of interest as a result of providing brokerage services through a broker-dealer. 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.](#)

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL**

- *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.*

Some financial professionals at Confluence are registered representatives of a broker-dealer. In this capacity these financial professionals may suggest that clients implement recommendations through the broker-dealer. This presents a conflict of interest as there is an incentive to recommend brokerage services and product based on the compensation received, rather than on the client needs. Additionally, 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](#).

***QUESTIONS 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, some of whom who are also registered representatives, can provide you brokerage services and receive a portion of the commissions or markups/markdowns from your trades from their associated broker/dealer.
- 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.

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.

***QUESTIONS 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.

***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?*