

# ETF Model Solutions, LLC

## Form ADV Part 3 – Client Relationship Summary

Date: 03/15/2024

### Item 1: Introduction

ETF MODEL SOLUTIONS, LLC (“ETFMS”, “we”, “us” or “our”) is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. We offer advisory accounts and services as an independent, fee-only fiduciary. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

### Item 2: Relationships and Services

***Questions to ask us: 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 investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: automated or digital investment advisory services that are supported with oversight by Investment Advisor Representatives via a wrap fee program through [www.Embark-Invest.com](http://www.Embark-Invest.com); portfolio management services as part of a wrap fee program through turnkey asset management platforms (a service that provides tools such as technology, operations support, investment research, access to money managers and other services to help advisers manage client assets); and, as a sub-adviser. As a portfolio manager in a wrap fee program or sub-adviser, we may manage all or portion of your assets held in one or more separate accounts. As part of our standard services, we typically monitor client accounts on a quarterly basis. Our firm has discretionary management authority without any material limitations. Our portfolios are primarily constructed of exchange-traded funds (ETFs) and mutual funds. We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. Our firm does *not* have a minimum account size. Please also see our Form ADV Part 2A (“[Brochure](#)”), specifically Items 4 & 7.

### Item 3: Fees, Costs, Conflicts, and Standard of Conduct

***Questions to ask us: 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? How might your conflicts of interest affect me, and how will you address them?***

What fees will I pay? Our fees vary depending on the services you receive. The amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. Our fees may be collected in advance, in arrears, or accrued daily. How we collect our fees is dependent upon the fee collection policies or restrictions imposed by the turnkey asset management platform, wrap fee program, custodian, or adviser through which you access our services. Fees for our Embark digital advisory services are calculated daily and billed quarterly in arrears. You pay our fees even if you do not have any transactions and the advisory fee paid to us does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#).

You will pay additional fees to one or more service providers when accessing our services: turnkey asset management platform, wrap sponsor, and custodian. When we provide services as a sub-adviser, you will also pay fees to your adviser. In a wrap fee program, your asset-based fee will include an “all-in-one” asset-based

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fee that will include advisory and/or sub-advisory fees and custody fees. Wrap accounts will not incur additional transaction fees. The wrap fee total may be higher or lower than if you paid transaction fees separately. The amount of assets in your account(s), the frequency that you add or withdraw assets from the account, the size of those transactions, and the frequency in which you make ongoing changes to your asset mix are factors that can impact whether or not the wrap account is more or less costly relative to a transaction-based account. Most investments (e.g., exchange-traded funds [ETFs], mutual funds, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. **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 also see our [Brochure](#) for additional details.

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 (see heading immediately below).*

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see Item 10 of our [Brochure](#) for additional details.

We are affiliated with Endowment Wealth Management, Inc., and Global Alternative Investment Management LLC. These entities provided advisory and/or fund management services for which they are compensated with advisory, management, performance and/or accounting fees that may earn more than what ETFMS charges for its services, which is a conflict of interest. See Item 10 of our [Brochure](#) for more detail.

### Item 4: Disciplinary History

***Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?***

Do you or your financial professionals have legal or disciplinary history? No. We do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

### Item 5: Additional Information

***Questions to ask us: 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?***

For additional information on our advisory services, see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/168410> and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 920-785-6010. Please direct any questions or concerns with respect to your relationship with us to Robert L. Riedl, Managing Member.

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**Exhibit A – Material Changes to Client Relationship Summary**

Material changes from ETFMS prior version dated 02/09/2023: Please see Item which has been amended to include client support and oversight to our Embark digital advisory services by Investment Advisor Representatives.