

CLIENT RELATIONSHIP SUMMARY March 31, 2023

REGISTERED INVESTMENT ADVISORS

Item 1: Introduction

Tingey Advisors Inc. is registered with the Securities and Exchange Commission as a Registered Investment Advisor. Our advisory services and fees differ from that of a brokerage firm and it is important for you, the retail investor, to understand the differences. For more information on these differences and to research firms and financial professionals, please see Investor.gov/CRS

Item 2: Relationships and Services

What investment services and advice can you provide me?

Tingey Advisors Inc. (TA) provides personalized portfolio management service and investment advice by understanding the client's objectives and evaluating his or her risk tolerance to establish a mutually agreed upon balance of stocks and bonds. You, the retail investor, will select and open a custodial account at a financial institution in your name where your assets will be deposited. As a client, you will appoint TA as your agent, empowering TA to have full authority to buy, sell, and trade in all securities held in the account.

TA not only provides discretionary portfolio management services for individuals, but also for trusts, retirement accounts, small businesses, foundations, and other institutions. In addition, TA provides non-discretionary financial advice to qualified retirement plans, including 401(k) and other defined compensation plans. As such, TA recommends for plan trustee approval, certain mutual funds, from which plan participants make their investment selections.

Ask your Tingey Financial Advisor

- 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?

Item 3: Fees, Cost, Conflicts and Standard of Conduct

What fees will I pay?

Tingey Advisors is a fee-based investment advisor. In return for management services described above, the retail investor agrees to pay TA an annual management fee calculated as a percentage of assets under management. These fees generally range from 0.50% to 1.10% of the portfolio value on an annual basis. Management fees are computed and paid on a quarterly basis. Such fees are generally deducted directly from client accounts. Depending on what custodian you choose, you may be charged custodial fees from that financial institution or trading commission from the broker who executes your trade. For more details see "Fees and Compensation" in our **Firm Brochure**.

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.

Ask your Tingey Financial Advisor

• 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 interests do you have?

At TA we adhere strictly to the highest standard of care to act for the sole benefit and interest of our clients throughout the investment process. We endeavor to avoid conflicts of interest between TA professionals and our clients. We abide by the Investment Advisors Act of 1940 and other federal and state securities laws and rules prohibiting fraudulent, deceptive, or manipulative trading by persons affiliated with investment advisers with respect to securities held, to be acquired or under consideration for purchase or sale.

TA manages proprietary accounts for its principals, which could present a conflict of interest. TA has adopted a Code of Ethics which guides our firm's decision-making process. It promotes confidentiality of information, suitability of investments, disclosure of personal trading, and identifies potential conflicts of interest. For more information on Code of Ethics, Client Transaction and Personal Trading at TA, see page 5 of our **Firm Brochure**.

Ask your Tingey Financial Advisor

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

How do your financial professionals make money?

TA Chartered Financial Analysts are paid either a salary or wages and may be paid a periodic bonus. No TA investment professionals are paid a commission and so there is no incentive for them to sell products such as annuities or life insurance. At TA, the only financial incentive our investment professionals have is to grow your portfolio while controlling risk. That may pose a conflict of interest, as investment professionals' endeavor to grow your portfolio. We believe that charging a management fee, rather than charging commissions, aligns our interests with your interests.

TA and its management persons are not engaged in business as a broker-dealer. TA receives no compensation from outside firms such as municipal securities dealer, government securities dealer, investment company, other pooled investment banking or thrift institution, account, accounting firm, lawyer, law firm, insurance company, insurance agency, pension consultant, real estate broker, real estate dealer, or a sponsor of limited partnerships. The only fees that TA receives are investment management fees from its clients.

Item 4: Disciplinary History

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

Neither TA nor its principals has been subject to any lawsuits or professional disciplinary action.

Ask your Tingey Financial Advisor

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

Item 5: Additional Information

For additional information about our investment advisory services or to obtain a copy of this document, please visit:

TingeyAdvisors.com

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Ask your Tingey Financial Advisor

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