



Customer Relationship Summary

Item 1 Introduction: Sowell Management (Sowell) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. 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 advisers, and investing.

Item 2 Relationships and Services: What investment services and advice can you provide me?

We offer investment advisory and financial planning services to retail investors. *Investment Authority:* All accounts give Sowell discretionary authority. Sowell may accept, at its sole discretion, non-discretionary accounts. *Monitoring:* Sowell Management monitors client portfolios on a continuous and ongoing basis. Such reviews are conducted by the Firm's investment personnel and/or investment adviser representatives. The frequency of reviews will depend upon the complexity of the accounts, the nature of the advisory recommendations, changes in tax or market conditions, as well as other conditions and material changes to the client's situation. For additional information, please see Sowell's Form ADV, Part 2A Brochure (Items 4 and 7).

Conversation Starter

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, Costs, and Standards of Conduct: What fees will I pay?

Principal Fees and Costs: Sowell Management offers investment management services for an annual negotiated fee based on the amount of assets under the Firm's management. This management fee generally varies up to 2.5% per annum, charged monthly in advance, depending upon the size and composition of a client's portfolio, the type of services rendered, and the investment adviser representative providing the advice and managing the client relationship. The fact that the investment adviser representative working with the client can determine the advisory fee, may result in clients with similar circumstances paying different fees to the Firm. Financial Planning fees are offered on a fixed fee basis or on an hourly basis. Financial Plan fees will range up to \$10,000 on a fixed fee basis or from \$150 to \$500 on an hourly basis.

Other Fees and Costs: In addition to the advisory fees paid to Sowell Management, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions. These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a client's account as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Sowell charges an **asset-based fee**; the more assets there are in a retail investor's account, the more a retail investor will pay in fees, and the firm will therefore have an incentive to encourage the retail investor to increase the assets in his or her account.

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. For additional information, please refer to Sowell's Form ADV, Part 2A brochure Items 4, 5, and 7.

Conversation Starter

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: When we recommend an advisory account, a rollover of a retirement plan account, refer a client to a third-party asset manager, or provide additional services for compensation, these recommendations create, in and of themselves, an incentive to make these recommendations based upon the amount of compensation we receive, rather than based upon your needs.

Conversation Starter

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

How do your financial professionals make money?

Sowell's financial professionals are compensated by cash compensation from the advisory and financial planning fees that we charge you. Our fee for services may vary depending on such factors as the amount of client assets we service and the time and complexity required to meet your needs. Clients are advised that a conflict of interest exists when our financial professionals recommend our services to you, in that we will earn a fee from the services provided to you and the financial professional will be directly compensated from those fees.

Item 4 Disciplinary History: Do you or your financial Professionals have legal or Disciplinary history? Yes

Sowell does not have any legal, financial, or disciplinary items to report. However, some of our financial professionals do have a disciplinary history.

Conversation Starter

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

Search Tool

Please visit investor.gov/CRS a free tool to research Sowell and our financial professionals.

Item 5 Additional Information: For additional information about our services, please refer to Sowell's Form ADV, Part 2A brochure Item 4 and Item 7. If you would like additional, up-to-date information or a copy of this disclosure, you may contact your finance professional, or you may call (501) 219-2434 and request the Compliance Department.

Conversation Starter

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?