

March 20, 2024

Covenant Asset Management, LLC (“Covenant”) is registered with the Securities and Exchange Commission as an Investment Adviser.

Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the difference. Covenant provides fee-based advisory account services. We are not a broker-dealer. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer an array of wealth management services to retail investors, including investment management of individual securities portfolios. Covenant also offers financial planning services. We only invest in publicly traded securities and do not offer proprietary products. As part of our standard services, Covenant monitors your account on a monthly basis, or more frequently as circumstances require. Covenant manages client accounts on a discretionary basis, meaning that you provide us with written authority to trade your account for you without contacting you prior to making investments. Covenant has no minimum account size requirement. We choose investments based upon your goals and objectives and the information that you provide to us, which information is updated regularly. ***Additional information about client services can be found in Covenant’s Form ADV Part 2 Item 4 and Item 7 or at <https://www.covasset.com/formadv>.***

Consider asking 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 fees will I pay?

Covenant is a fee-based investment advisor and only earns fees clearly listed on the fee agreement included in the investment advisory agreement or financial planning agreement signed by each client. Financial planning fees are charged on an hourly/fixed fee basis, with one-half generally due in advance and the balance due on completion of services. Annual fees for portfolio management services typically start at 1.25% of total assets under management. However, fees are negotiable depending on the size and complexity of a client’s account. Fees are charged in arrears based upon the assets held in the account at the end of each month. Covenant’s Fees do not include certain charges imposed by custodians, brokers, and other third parties such as custodial fees, account maintenance fees, transaction charges, interest on margin loans, deferred sales charges, 12b-1 fees, odd-lot differentials, transfer taxes, wire transfers, alternative investment processing fees, electronic fund fees, ETF and mutual fund management fees, other product-level fees and other fees and taxes on brokerage accounts and securities transactions. Covenant does not have any revenue sharing agreements and we do not receive any payment from your custodian in exchange for holding your account on their platform. Our asset-based fee arrangement could give us an incentive to encourage you to deposit more assets in your account because it would increase our fees. ***Additional information on fees can be found in Covenant’s Form ADV Part 2 Item 5 or at <https://www.covasset.com/formadv>.***

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.

Consider asking us: Help me to 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.

Covenant or persons associated with our firm can buy or sell the same securities that we recommend to you, or in which you are already invested. A conflict of interest could exist in such cases if we had the ability to trade ahead of you and potentially receive more favorable prices than you receive. It is our established policy that Covenant and persons associated with our firm never have priority over your account in the purchase or sale of securities. **For more information, see [Form ADV Part 2 Item 5](#) or at <https://www.covasset.com/formadv>.**

We have a conflict of interest when recommending that you roll over a retirement account such as a 401k or IRA to a managed account, because we will receive a fee for managing these additional assets. Because Covenant receives more fees on higher account balances, it may have an incentive to encourage you to increase the assets in your account. You are never under any obligation to add to your Covenant account. **For more information, see [Form ADV Part 2 Item 11](#) or at <https://www.covasset.com/formadv>.**

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

How do your financial professionals make money?

Our advisors receive a portion of the management fee that we receive on your assets that we manage for you. The more your portfolio with Covenant appreciates in value, whether because of market performance or additional assets under management, the greater your advisor's compensation will be. Our professionals do not receive extra compensation based upon the time spent or complexity of your account, 12b-1 fees, or product sales commissions. We may also receive hourly/fixed fees for stand-alone financial planning services.

Some of Covenant's registered advisers are also insurance registered and will receive a share of the commissions paid by the carrier for selling life insurance products. While you pay no extra for these commissions, this creates a conflict of interest by raising the possibility that insurance products could be recommended by your advisor because of the commission generated. You are never under obligation to purchase any products from Covenant. **For more information, see [Form ADV Part 2 Item 10](#) or at <https://www.covasset.com/formadv>.**

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

No. For a free and simple search of our financial professionals, please visit [Investor.gov/CRS](https://investor.gov/CRS).

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

Additional information on our firm can be found at: <https://adviserinfo.sec.gov/firm/summary/108567> and www.covasset.com. If you need a copy of this relationship summary or other up-to-date information, please contact us at 908-879-5330 or email us at covenant@covasset.com.

Consider asking: Who is my primary contact person at Covenant? 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?