

Item 1 – Introduction

3D Asset Management, Inc. ("3D") is an investment adviser registered with the Securities and Exchange Commission (SEC). The services and fees charged by investment advisory and brokerage firms differ, and it is important that retail investors understand the difference. Free and simple tools are available to research firms and financial professionals at <https://www.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?"

3D manages investment portfolios for individuals, qualified retirement plans, trusts, and businesses. 3D will create a portfolio of no-load mutual funds and/or Exchange Traded Funds or Exchange Traded Notes (herein after collectively, "ETFs"), and may use model portfolios if the models match the client's investment policy. 3D manages the assets in client accounts on a fully discretionary basis. We will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. 3D recommends portfolios consisting primarily of passively managed asset class and/or index mutual funds and ETFs. 3D will hold actively managed asset class mutual funds and ETFs if warranted. Client portfolios may also include some individual equity securities, bonds or CDs. We actively monitor client accounts.

Given the size and complexity of the global investment markets we try to focus our own investment management efforts in area where we have specific expertise and use the talents, skills and expertise of others to provide for our clients managed portfolios that fall outside of our wheelhouse. We therefore offer Managed Portfolios designed by our own investment team as well as managed portfolios designed by other, Third Party, investment management firms. We do review these other investment managers' portfolios on a regular basis as well as monitor the managers themselves and it is our Operations, Trading and Administrative personnel that ultimately implement both the 3D Managed Portfolios as well as those provided by the Third Party investment management firms mentioned above.

We offer a wrap fee program as further described in Part 2A, Appendix 1 (the "Wrap Fee Program Brochure") of our Brochure. Our wrap fee and non-wrap fee accounts are managed similarly and are offered separately to provide financial advisors choice of pricing structures. As further described in our [Wrap Fee Program Brochure](#), we receive a portion of the wrap fee for our services.

3D offers its services primarily through other financial service intermediaries who act as Solicitors or Referring advisors. We also have a limited number of Investment Advisor Representatives that offer the investment management services described above as well as financial planning and retirement income planning services to their clients. Additionally, we work directly with institutional clients, primarily public and corporate retirement plans. The minimum account size for solicited, referred and direct retail client's is \$25,000. Minimum account size for institutional clients varies by the type of plan and the needs of the client. Any account minimum may be waived at 3D's discretion. For Wrap Fee Clients, Sponsor Firms will set the minimum account size.

(For more information please refer to our ADV Part 2A Item(s) 4, 7, 8, 13, 14 and 16 - <https://adviserinfo.sec.gov/firm/brochure/139595>)

Relationships and Services Conversation Starters: We encourage you to start a conversation with 3D and ask the following questions:

"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, Conflicts, and Standard of Conduct

"What fees will I pay?"

Fees charged by 3D to client accounts may include the following: Platform Fee, which is the cost of providing the personnel, software and overhead that allows us to provide back- and middle-office services to financial advisors and ultimately, clients; Investment Management Fee, which is calculated as a percentage of assets under management reflects the cost of personnel, data and research subscriptions, software and overhead that allows us to staff and execute the investment research and management function as well as due diligence and review of the Third Party firms mentioned in Item 2, above. Solicitor or Referrer Fee, which is the fee charged by your financial advisor that covers their business expenses.

Other fees include: Custody, transaction and other fees charged by qualified custodians such as Charles Schwab & Co., TD Ameritrade and other similar firms; Mutual Fund and ETF management and administrative costs, which are reflected in the net asset value of these products on a daily basis.

The Platform, Investment Management and Solicitor/Referrer fees described above are disclosed in your Investment Management Agreement as annual fees and are combined and charged on a monthly or quarterly basis in arrears and are typically deducted directly from your account but only as explicitly authorized by you. Custody and Transaction fees are charged by the custodian directly to your account. Mutual Fund and ETF fees are included in the net asset value of the fund or ETF and are therefore reflected in their performance daily and are described in detail in the fund or ETF prospectus. Asset-based fees associated with the wrap fee program will include most transactional costs and fees to a broker-dealer or bank that has custody of those assets, and therefore are higher than a typical asset-based advisory fee.

Additional Information:

You will pay the fees and costs described above whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time compared to the same exact investment strategies if they were provided free of charge. Please make sure you understand what fees and costs you are paying.

(For more information on fees and costs please refer to our ADV Part 2A Item(s) 5 and 6 - <https://adviserinfo.sec.gov/firm/brochure/139595>)

Impact of Fees and Costs Conversation Starter: We encourage you to start a conversation with 3D and ask the following questions:

“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 does your firm make money and what conflicts of interest do you have?”

When 3D acts 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 that means. Our sole source of income is the fees we receive from clients. We do receive more revenue when your account grows or when you move additional money into your account with 3D. Therefore we are incentivized to acquire new clients to increase assets under management and have our current clients add additional assets.

We offer no proprietary product, nor do we participate in securities or insurance commissions.

Third Party Marketing and Educational Support. 3D supports the advisors that use our platform and investment management services to help their clients achieve their financial goals. This support may include client-appreciation events such as luncheons, dinners and holiday parties. We will often partner with mutual fund and ETF companies to pay for these events. Likewise, 3D routinely performs research and due diligence on companies, products, economic conditions and other factors that influence the investment markets. Some of this research requires travel, data acquisition and other hard dollar costs. 3D will occasionally accept payment of travel expenses or data files that might otherwise result in a subscription fee from companies whose products may be used in some of our investment strategies.

Conflicts Conversation Starter: How might your conflicts of interest affect me and how will you address them?

How do your financial professionals make money?

All employees of 3D are paid salaries or hourly wages, and all are eligible for discretionary bonuses. Our investment staff is paid an annual salary and a bonus based in part on investment performance relative to appropriate benchmarks and in part on other success factors related to other company goals. Our investment advisor representatives are independent contractors and are paid a percent of the total fees charged to client accounts for which they act as financial advisor and primary relationship manager.

Please refer to our ADV Part 2 for further information on our conflicts of interest and how we address them. Use the following link to go directly there: <https://adviserinfo.sec.gov/firm/brochure/139595>

Item 4 – Disciplinary History

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

Yes. Disciplinary information related to 3D and any of its financial professionals is available for review through <https://adviserinfo.sec.gov/>. Also visit <https://www.investor.gov/CRS> for a free, simple search tool to research us and our financial professionals

Disciplinary History Conversation Starters: As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5 – Additional Information

For additional information on our advisory services, see our Brochure available at <https://adviserinfo.sec.gov/firm/summary/139595>. If you have any questions or would like a copy of Form CRS please contact us at (860) 291-1998 or visit our website at <https://3dadvisor.com/>

Additional Information Conversation Starters: 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?