

Form CRS: Dual Registrant

## Abner, Herrman & Brock, LLC Form CRS: Dual Registrant Effective: June 2020

#### Introduction

Abner, Herrman & Brock, LLC (AHB) is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC).

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.

We offer both brokerage and investment advisory services to retail investors.

# What investment services and advice can you provide me?

## Abner, Herrman & Brock Brokerage Services

The firm provides **brokerage services** on a non-discretionary basis. This means that you will make the decision regarding the purchase or sale of investments. There is no account minimum value to open or maintain a brokerage account at our firm.

AHB will not be monitoring the investments that are made in the brokerage accounts. It is the responsibility of the brokerage client.

AHB provides brokerage services through its AHB Wrap Fee Program. AHB, a registered broker-dealer, also provides a variety of execution and other brokerage services to clients on a fully disclosed basis through National Financial Services LLC ("NFS"), AHB's clearing broker. AHB is the exclusive investment manager in the AHB Wrap Fee Program.

## Abner, Herrman & Brock Advisory Services

Abner, Herrman & Brock provides Investment Advisory services to retail clients. The minimum account size is \$500,000. AHB has the discretion to waive the account minimum when deemed appropriate.

Through the AHB Wrap Fee Program, the firm provides investment advisory services on a discretionary basis. This means we will make the ultimate investment decisions without your signoff. Investment services are provided within guidelines formulated with each client, based upon defined investment objectives.

## Abner, Herrman & Brock as an Advisor to Wrap Fee/SMA Programs

AHB, as an **investment adviser**, participates in certain "wrap fee programs" (also known as "Separately Managed Accounts" programs or "SMA programs.") In such programs, a client pays a program sponsor a single "wrap fee" for advisory services, certain brokerage services, monitoring of the investment adviser's performance and custodial services, or some combination of these or other services.

The minimum account size for an account in an SMA program varies by sponsor but typically is \$100,000.

*For additional information,* For additional information, please visit <a href="https://www.ahbi.com">www.ahbi.com</a>, Form ADV, Part 2A brochure, or the Wrap Fee Brochure.

#### Conversation Starters. Ask your financial professional-

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?
- Please explain what the abbreviations in your licenses are and what they mean.
- How often will you monitor my accounts performance and offer investment advice?

#### What fees will I pay?

#### Abner, Herrman & Brock Brokerage Abner, Herrman & Brock Investment **Services**

#### AHB brokerage clients pay a transactionbased fee (commission). Clients pay AHB commissions for effecting transactions and may also pay market makers a markup or mark down which is included in the offer or bid price of the securities purchased or sold.

You may also pay miscellaneous fees that your account's custodian may charge, including wire fees, transfer fees, bank charges and other fees, as well as fees and expenses that are included in the expense ratios in certain investments, including mutual funds and ETFs.

Under AHB's Wrap Fee Program, clients management, receive investment brokerage and custodial services for an allinclusive (or "wrap") fee which varies as follows depending upon the asset allocation and amount of assets in the portfolio. Fees are based on the market value of the portfolio and are billed in advance on a quarterly basis for advisory services to be rendered during the quarter. Fees are based upon percentage of assets under management. In addition to the wrap fee, clients pay an administrative service charge on each transaction in the portfolio.

For additional information about the fees and costs for our Brokerage Services, please request a transaction-based fee schedule from our clearing firm, National Financial Services.

## **Advisory Services**

Under AHB's Wrap Fee Program, clients receive investment management, brokerage and custodial services for an all-inclusive (or "wrap") fee which varies as follows depending upon the asset allocation and amount of assets in the portfolio. Fees are based on the market value of the portfolio and are billed in advance on a quarterly basis for advisory services to be rendered during the quarter. Fees are based upon percentage of assets under management. In addition to the wrap fee, clients pay an administrative service charge on each transaction in the portfolio.

A wrap advisory fee includes transaction costs and fees paid to a brokerdealer or bank that has custody of your assets, and therefore is typically higher than a typical asset based advisory fee that does not include transaction costs and fees. Our clients typically pay the advisory fee each quarter, but please see your advisory agreement for the payment frequency that applies to your account.

During initial conferences with prospective clients, investment objectives are identified, an asset allocation plan is devised, and the firm's advisory fee structure is discussed. If clients elect to retain AHB as a portfolio manager, clients are provided with a letter outlining the agreed upon objectives, asset allocation plan and fee for such advisory services.

#### Abner, Herrman & Brock as an Advisor to Wrap Fee/SMA Programs

As compensation for our **investment** adviser services, AHB receives a portion of the wrap fee that is charged by the sponsors

of the wrap fee programs. The fees that we receive from the sponsors of the wrap fee programs, are "asset-based." This means that the fee is calculated as a percentage of the assets invested in your advisory account. In most cases, AHB acts under a subadvisory agreement with the sponsor of the SMA programs.

A wrap advisory fee includes most transaction costs and fees paid to a broker-dealer or bank that has custody of your assets, and therefore is typically higher than a typical asset based advisory fee that does not include transaction costs and fees. Our clients typically pay the advisory fee each quarter, but please see your advisory agreement for the payment frequency that applies to your account.

For additional information, please ask your financial advisor to see your advisory agreement.

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.

#### Conversation Starter. Ask your financial professional—

- 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 much would I expect to pay per year for an advisory account or brokerage account? What would make those fees more or less? What services will I receive with the fees that I pay?
- What additional costs should I expect in connection with my account?
- Tell me how you and your firm make money in connection with my account. Do you or your firm receive any payments from anyone else besides me in connection with my investments?

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you. Here are some examples to help you understand what this means.

- Abner, Herrman & Brock as a <u>broker-dealer</u> may have an incentive to encourage a
  retail investor to trade often since a retail investor would be charged more when
  there are more trades in his or her account.
- Abner, Herrman & Brock as an <u>investment adviser</u> may have an inventive to
  encourage the retail investor to increase the assets in his or her account since the
  more assets the firm manages, the more a retail investor will pay in fees.

	Conversation Starter. Ask your financial professional—
	What were the most common conflicts of interest in your advisory and brokerage accounts?
	<ul> <li>How might your conflicts of interest affect me, and how will you address them?</li> </ul>
	For additional information, please see Form ADV, Part 2A brochure.
How do your financial professionals make money?	Our professionals are paid on a salary basis. Our employees also receive a bonus and may receive an incentive basis compensation tied to the overall growth of Abner, Herrman & Brocks assets under management.
make money:	AHB may compensate our financial professionals for client referrals.
Do you or your financial	Yes. Please go to <a href="https://www.Investor.gov/CRS">https://www.Investor.gov/CRS</a> for a free and simple search tool to research Abner, Herrman & Brock and its financial professionals.
professionals have legal or disciplinary history?	<ul> <li>Conversation Starter. Ask your financial professional—</li> <li>As a financial professional, do you have any disciplinary history? For what type of conduct?</li> </ul>
Additional Information	For additional information about our services, visit Investor.gov, brokercheck.finra.org, or our website, www.ahbi.com.
	If you would like additional, up-to-date information or a copy of this disclosure, please call 201-484-2000 or email us at <a href="mailto:info@ahbi.com">info@ahbi.com</a> .
	To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330.
	To report a problem to FINRA, visit <a href="https://www.finra.org/investors/have-problem/file-complaint/complaint-center">https://www.finra.org/investors/have-problem/file-complaint/complaint-center</a> .
	If you have a problem with your investments, account or a financial professional, contact us at <a href="mailto:info@ahbi.com">info@ahbi.com</a> or at (201) 484-2000.
	<ul> <li>Conversation Starter. Ask your financial professional—</li> <li>Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? What can you tell me about his/her legal obligations to me? Who can I talk to if I have concerns about how this person is treating me?</li> </ul>