

RIVERWATER PARTNERS AND RIVERWATER BLUE
CUSTOMER RELATIONSHIP SUMMARY
MARCH 23, 2023

Riverwater Partners, LLC ("our firm", "we", "us"), is registered with the Securities and Exchange Commission as an Investment Advisor. We also have a DBA Riverwater BLUE.

Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the 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.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

As part of our standard services to retail clients, our firm offers investment management services on an ongoing, discretionary basis, which means that we are able to buy and sell securities without your prior approval, or non-discretionary basis which means that we will seek your approval before making any trades. Riverwater Partners accounts are full-service investment accounts. We also offer our services through wrap fee programs. For these accounts, we generally provide advice on stocks, bonds, mutual funds, exchange-traded funds, fixed income and others. If you are invested in Riverwater Partners accounts, you may impose reasonable restrictions on investing in certain securities or types of securities within your portfolio. We will review your account on a periodic basis based on your stated investment policy guidelines. We also offer responsible investing services on a digital platform in one of five model portfolios through our DBA Riverwater BLUE. Clients invested in Riverwater BLUE also have the option to receive fee-based financial planning services. We require a minimum account size of \$1,000,000 with Riverwater Partners and \$5,000 with Riverwater BLUE for you to open an account with us, however, we reserve the right to make exceptions.

For additional information regarding our services, please see items 4, 7, and 16 of our [Form ADV Part 2A](#).

Consider asking us these 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?

WHAT FEES WILL I PAY?

You will pay a quarterly fee for Riverwater Partners, and a monthly fee for Riverwater BLUE, both based upon a percentage of the total amount of assets you have with us. Full service Riverwater Partners clients receive financial planning services. If you are a Riverwater BLUE client, you will pay an hourly rate, negotiated with you at the time of signing the contract with us, for our financial planning services. If you are part of a wrap program, you will generally pay one fee to the wrap program sponsor that includes all trading, transactions and portfolio management costs and are therefore higher than typical asset-based advisory fees. While we do not charge the following fees, you may also pay custodial fees, a transaction fee when we buy or sell an investment in your account and additional fees charged by mutual funds and exchange traded funds we have recommended for your account. Our advice is not driven by commission or incentives generated by the products recommended.

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 regarding our fees, please see item 5 of our [Form ADV Part 2A](#)

Consider asking us these 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 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 is an example to help you understand what this means.

Example conflict of interest: The more money you invest with us the more fees you will pay; therefore, we have an incentive to encourage you to increase your assets in your account.

Consider asking us these questions:

- How might your conflicts of interest affect me, and how will you address them?
- How do your financial professionals make money?

For additional information regarding our fees, please see item 5 of our [Form ADV Part 2A](#).

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are paid a salary and, if they are owners, a percentage of the firm's profits. Some receive a commission based upon fees you have paid to us. This creates a conflict because we may encourage you to increase the amount of assets you have with us.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Please visit investor.gov/CRS, for a free and simple tool to research our firm and financial professionals.

Consider asking us these questions:

- As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

WHAT IF I NEED ADDITIONAL INFORMATION?

For additional information regarding our fees, services, and conflicts, please see our [Form ADV Part 2A](#), or visit our websites www.riverwaterpartners.com and www.riverwaterblue.com. Please contact us at **414-858-8000** for more up-to-date information or to request a copy of this customer relationship summary.

Consider asking us these questions:

- Who is my primary contact person?
- Who can I talk to if I have concerns about how this person is treating me?

We updated our Client Relationship Summary on March 23, 2023. Below you will find a summary of the changes made to our previous summary dated June 11, 2020.

Section Heading	Summary of Change
Item 2: Relationship and Services	Added "in one of five model portfolios" to specify that Riverwater BLUE has 5 model portfolios. We also added "We also offer our services through wrap fee programs."
Item 3: Fees, Costs, Conflicts, and Standard of Conduct	Added that if you are a Riverwater BLUE client, "you will pay an hourly rate, negotiated with you at the time of signing the contract with us, for our financial planning services." We also added "If you are part of a wrap program, you will generally pay one fee to the wrap program sponsor that includes all trading, transactions and portfolio management costs and are therefore higher than typical asset-based advisory fees."