

### Item 1 Introduction

APO Financial Services, LLC is an investment advisor registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://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 provide investment advisory services, including discretionary and non-discretionary investment management and financial planning services to individuals (our “retail investors”). We also host educational seminars for retail investors.

- We monitor, on a continuous basis, investments in the accounts over which we have authority as part of our standard investment management service. We formally review your account at least annually to ensure your investment portfolio is still appropriate based on any changes to your financial condition, goals and objectives, liquidity needs, time horizon or risk profile.
- We typically manage investment accounts on a discretionary basis which permits us to decide which investments to buy or sell for your account. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account or by opting out of proprietary funds) by providing our firm with your restrictions in writing. We also manage accounts on a non-discretionary basis. When you choose to have your accounts managed on a non-discretionary basis, we may not buy or sell investments without your approval and you will ultimately decide which investments to buy and sell for your account.
- We do not limit the scope of our investment advisory services to proprietary products or a limited group or type of investment.
- We do not have a minimum account size or investment amount. **Additional information about our advisory services is found in Items 4, 5, 7 & 16 of our [Firm Brochure](#).**

#### Questions to ask 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?*

### Item 3 Fees, Costs, Conflicts, and Standard of Conduct

#### What fees will I pay?

We charge an annual fee based upon the amount of assets we are managing for you. Our fee is negotiable, depending upon various factors including but not limited to: (the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; the professional(s) rendering the service(s); and relationships with APO and/or its representatives) but will not exceed 1.5% annually. The more assets you have in your advisory account(s), the more you will pay us and therefore we have an incentive to increase those assets in order to increase our fees. Fees for financial planning and/or consulting services are charged on either a fixed or hourly fee basis based upon the level and scope of the service(s) required and the professional(s) rendering the service(s); and typically range from a fixed fee of \$1,000 to \$10,000 or up to \$500 per hour when charged on an hourly rate basis. Attendees of educational seminars may be assessed a fee ranging from \$40 to \$100 paid in advance determined by the length of the event, the number and expertise of the presenters involved, and whether or not educational materials are provided.

In addition to fees paid to us, certain investment products (e.g. mutual funds, ETFs, variable annuities) impose additional fees that reduce the value of your investment over time. You will also pay fees to the custodian that will hold your assets. 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 more information about fees and costs that may apply, please see Item 5 of our [Firm Brochure](#).**

## Form ADV Part 3 – Client Relationship Summary

Date: 03/2022

**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:

- **Brokerage Services** Your financial professional may be a registered representative of an unrelated broker dealer, and may earn a portion of commission clients pay for security transactions when acting as a representative of the broker dealer. The receipt of this additional compensation gives your Financial Professional incentive to recommend investment products offered through the broker dealer. Clients are not obligated to use the limited services of the broker dealer and effecting your financial professional’s recommendation.
- **Soft Dollars** We generally recommend Axos Advisor Services to serve as custodian to our clients. Axos Advisor Services provides us with certain products and services at no cost that benefit us but do not benefit clients. The receipt of such creates a conflict of interest as it gives us an incentive to have clients custody their assets at our recommended custodian.
- **Insurance Sales** When you purchase insurance products through our financial professionals, an affiliate and/or your financial professional receives compensation related to that purchase. The receipt of this additional compensation gives us and our Financial Professional an incentive to recommend insurance products. You are under no obligation to purchase insurance or other products through us or our Financial professionals.

Additional information can be found in Items 4, 10, 11, 12, and 14 of our [Firm Brochure](#).

**How do your financial professionals make money?**

Our financial professionals receive a percentage of the fees you pay to us for investment advisory services they provide you. Financial Professionals licensed to sell insurance also receive compensation in the form of commission when you purchase insurance products they recommend. It is important to review our financial professional’s ADV Part 2B Brochure.

**Questions to ask us:**

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

**Item 4 Disciplinary History**

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

Yes. The firm does not have any legal or disciplinary history. Some of our financial professionals do have legal and/or disciplinary history. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Questions to ask us:**

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

**Item 5 Additional Information**

For up-to-date information or to request a current copy of our Form CRS, contact ust at (720) 588-2000, email us at [info@apofinancial.com](mailto:info@apofinancial.com) or visit us at <https://apofinancial.com/>.

**Questions to ask us:**

- *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?*