

Commerce Advisors, LLC
Form CRS Customer Relationship Summary – March 8, 2024
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<p>Item 1. Introduction</p>	<p>Commerce Advisors, LLC (CA) is registered with the Securities and Exchange Commission (SEC) as an investment adviser and NOT a broker. Brokerage and investment advisory services and fees differ and it is important for the <i>retail investor</i> to understand the differences. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<p>Item 2. Relationships and Services</p> <p>“WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?”</p>	<p>Commerce Advisors offers investment advisory services to retail investors, including financial planning, portfolio management, retirement plan advisory services, and alternative management services offered through separately managed accounts. Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the manager of the portfolio and is part of your standard services. We offer both discretionary and non-discretionary services. As a discretionary investment adviser, CA will have the authority to supervise and direct without prior consultation with the client. All discretionary accounts adhere to the client’s asset allocation and risk tolerance. Under a non-discretionary arrangement, clients must be contacted prior to the execution of any trade in the account(s) under management and make the ultimate decision regarding the purchase and/or sale of investments.</p> <p>Clients may impose certain restrictions on CA in the management of their investment portfolio, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship.</p> <p>Commerce Advisors does not make available or offer advice with respect to proprietary products except for its separately managed account services. There are no requirements for retail investors to open or maintain an account with a minimum account size or investment.</p> <p><i>For additional information</i>, please see Form ADV, Part 2A brochure (Item 5 of ADV and 4 and 7 of Part 2A) https://commerceedadvisorsllc.com/services/compliance/</p> <p><i>Conversation Starters.</i> Ask your financial professional—</p> <ul style="list-style-type: none"> • “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?”
<p>Item 3. Fees, Costs, Conflicts, and Standard of Conduct</p> <p>“WHAT FEES WILL I PAY?”</p>	<p>Fee arrangements are individually negotiated and agreed upon with each client. Commerce Advisors and the <i>retail investor</i> may agree to a fixed fee amount per year, or may agree to a fee that is calculated and assessed as a percentage of assets under management.</p> <p>Both fixed fees and asset-based fees are negotiated and agreed upon based upon client expectations of service, portfolio asset size, and scope of service provided, complexity of service, risk factors and input costs. Asset based fees generally range from 0.30% to 1.00% annually, depending upon the particular client's portfolio size and specific service needs. Fees are open to negotiation subject to management approval, with a stated minimum annual fee.</p> <p>Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization, unless other arrangements are made fees are normally debited directly from client account(s).</p> <p>Fees associated with stand-alone financial planning services will be a fixed fee based upon the scope, complexity and quality of the recordkeeping employed by the client.</p> <p>The more assets there are in a <i>retail investor’s</i> advisory account, the more a retail investor will pay in fees, and the firm may therefore have an incentive to encourage the <i>retail investor</i> to increase the assets in his or her account.</p> <p><i>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.</i></p> <p><i>For additional information</i>, please see Form ADV, Part 2A brochure (Items 4 and 7 of Part 2A). https://commerceedadvisorsllc.com/services/compliance/</p> <p><i>Conversation Starter.</i> Ask your financial professional—</p> <ul style="list-style-type: none"> • “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?”

<p>“WHAT ARE YOU’RE 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?”</p>	<p><i>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.</i></p> <p>Examples of Ways You Make Money and Conflicts of Interest:</p> <ol style="list-style-type: none"> Third Party Payments: CA receives no compensation from third parties. We recommend, but do not sell certain investments or receive commissions from securities transactions Revenue Sharing: CA does not participate in any type of revenue sharing. Principal Trading: CA does not participate in any type of principal trading. <p><i>Conversation Starter.</i> Ask your financial professional—</p> <ul style="list-style-type: none"> “How might your conflicts of interest affect me, and how will you address them?” <p><i>For additional information,</i> please see Form ADV (Item 7.A.) and Part 2A brochure (Items 5, 10 and 14 of Part 2A). https://commerceadvisorsllc.com/services/compliance/</p>
<p>“HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?”</p>	<p>Financial professionals at Commerce Advisors are paid via a salary plus a discretionary bonus based on contribution to the Firm’s overall assets and not via portfolio performance or commission. Kurt Voldeng and William Woodmansee as owners in Commerce Holdings, LLC and may receive a distribution of profits related to his ownership interest in Commerce Holdings.</p> <p>One of Commerce Advisors employees is also a Registered Representative of Purshe Kaplan Sterling Investments (“PKS”), an unaffiliated broker dealer and FINRA and SIPC member. As such, he is entitled to receive commissions or other remuneration on the sale of annuities, 529 plans and 401(k) plans. Generally, these investment products are consummated at the request of a client or due to the fact that the investment products commission fee is less than Commerce Advisors minimum advisory fee.</p> <p>Commerce Advisors financial professionals are not compensated based on factors such as: the amount of client assets they service; the time and complexity required to meet a client’s needs; the product sold; product sales commissions; or revenue the firm earns from the financial professional’s advisory services or recommendations.</p>
<p>Item 4. Disciplinary History</p> <p>“DO YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?”</p>	<p>Yes.</p> <p>Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p><i>Conversation Starter.</i> Ask your financial professional—</p> <ul style="list-style-type: none"> “As a financial professional, do you have any disciplinary history? For what type of conduct?”
<p>Item 5. Additional Information</p>	<p>For additional information about Commerce Advisors investment advisory services, please visit our website https://commerceadvisorsllc.com/ or ADV 2A at https://commerceadvisorsllc.com/services/compliance/</p> <p>If you would like additional, up-to-date information or a copy of this disclosure, please call (901) 260-6050 and request up-to-date information and a copy of Form CRS or ADV Part 2A.</p> <p><i>Conversation Starter.</i> Ask your financial professional—</p> <ul style="list-style-type: none"> “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?”

Commerce Advisors, LLC

March 8, 2024

Exhibit to Form CRS

Commerce Advisors, LLC is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS, implemented on March 8, 2024:

We charge an asset based fee generally ranging from 0.30% to 1.00% for portfolio management services.