

Introduction

Our firm, Modus Advisors, LLC, is an investment adviser registered with the Securities and Exchange Commission. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We are a registered investment adviser that offers investment advisory services to clients. Our advisory services include Asset Management, Comprehensive Portfolio Management Financial Planning & Consulting, and Separately Managed Account services made available through Schwab's Managed Account Program. If you open an advisory account with our firm, we'll meet with you to understand your current financial situation, existing resources, goals, and risk tolerance. Based on what we learn, we'll recommend a portfolio of investments that is monitored at least annually, and if necessary, rebalanced to meet your changing needs, stated goals and objectives. We'll offer you advice on a regular basis and contact you at least annually to discuss your portfolio.

You can select in our agreement whether we are allowed to buy and sell investments in your account without asking you in advance ("discretion") or buy and sell investments in your account only after receiving your permission ("non-discretion"). If you select non-discretion, you make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. We will have discretion or non-discretion until the advisory agreement is terminated by you or our firm.

We do not restrict our advice to limited types of products or investments.

Our firm requires a minimum account balance of \$250,000 to open an account for our Asset Management and Comprehensive Portfolio Management services.

Financial Planning & Consulting is included in our Comprehensive Portfolio Management for no additional fee. Financial Planning & Consulting is also offered as a separate service for a flat or hourly fee. We do not monitor your investments for the standalone Financial Planning & Consulting service.

Additional information about our advisory services is in Item 4 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/brochure/291204>.

What fees will I pay?

You will be charged an ongoing quarterly fee based on the value of the investments in your account. Our maximum Asset Management annual fee is 1.20%, while our maximum Comprehensive Portfolio Management annual fee is 1.25%. The more assets you have in your advisory account, the more you will pay us. We therefore have an incentive to increase the assets in your advisory account in order to increase our fees. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. Our firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account. In rare cases, our firm will agree to send you invoices rather than automatically deduct our firm's fees from your advisory account.

Our maximum flat fee is \$10,000 and maximum hourly rate is \$300 for our Financial Planning & Consulting service. We charge an upfront retainer of 50% when you sign an agreement and charge you the remaining fee when we provide a financial plan or consultation.

The broker-dealer that holds your assets may charge you a transaction fee when we buy or sell an investment for you. The broker-dealer's transaction fees are in addition to our firm's fees for our Asset Management and Comprehensive Portfolio Management services.

You may also pay charges imposed by the broker-dealer holding your accounts for certain investments and maintaining your account. Some investments, such as mutual funds, index funds, and exchange traded funds charge additional fees that will reduce the value of your investments over time.

In certain cases, we may select third party money managers, sub-advisers, and/or separate account managers offered through Schwab's Managed Account Program who will assist us with managing your account. If selected, they will charge you a fee, which will be described to you in their Form ADV.

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.

Additional information about our fees is in Item 5 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/brochure/291204>.

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:

Our firm's financial professionals include licensed insurance agents who can sell insurance products for a commission. They have an incentive to recommend insurance products to you in order to increase their compensation.

Additional information about our conflicts of interest is in Item 10 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/brochure/291204>.

How do your financial professionals make money?

Our financial professionals are compensated based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, and the time and complexity required to meet a client's needs.

In 2018, we received transition assistance from Schwab for transferring most of our client accounts to Schwab to maintain custody of client assets. Our firm used these benefits to offset the cost of new technology utilized by our firm to service client accounts. Schwab also directly reimbursed client accounts for fees incurred when closing accounts at the prior custodian. However, these benefits have expired.

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

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Additional Information

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #291204. You may also contact our firm at (952) 946-1000 to request a copy of this relationship summary and other up-to-date information.

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 those qualifications mean?
- Help me understand how these fees and costs may 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?
- As a financial professional, do you have any disciplinary history?
- For what type of conduct?
- 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?