Client Relationship Summary Ashton Stewart & Company Inc.

Ashton Stewart & Company Inc. ("ASC") is registered with the Securities and Exchange Commission and Financial Industry Regulatory Authority ("FINRA") as a broker-dealer, is also a member of SIPC. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences.

This document is a summary of the services and fees we offer to "retail investors", which are natural persons who seek or receive services primarily for personal, family, or household purposes. Additionally, 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, and brokercheck.finra.org, which provides pertinent facts including disciplinary history about member firms and individual registered representatives.

What investment services and advice can you provide me?

ASC offers the following brokerage services, accounts, investments to retail investors: Private Placements.

For parameters of each brokerage service listed above, please refer to disclosures on our website www.ashtonstewart.com

Key Questions to 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?

What fees will I pay?

The principal fees and costs associated with engaging our firm for private placements are disclosed in the "Fees" section of a private placement offering document.

For detailed information regarding our brokerage fees and cost, refer to the disclosures received at the time of solicitation.

The fees that you pay to our firm ARE DISCLOSED IN OUR OFFERING DOCUMENTS. Please ask questions if you do not understand the fees charged.

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.

Key Question to 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?

What are your legal obligations to me when providing recommendations as my brokerdealer 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, 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 we provide you.

Key Question to Ask Your Financial Professional

✓ How might your conflicts of interest affect me, and how will you address them?

How do our financial professionals make money?

The financial professional(s) servicing your account(s) are compensated based on *salary, commissions and bonuses*.

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

Yes. Disclosures for our firm or our financial professionals can be found by going to lnvestor.gov/CRS and https://brokercheck.finra.org/.

Key Questions to Ask Your Financial Professional

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

You can find additional information about our brokerage, request a copy of the relationship summary at (866) 342-1069 or by clicking the link provided www.ashtonstewart.com.

Key Questions to Ask Your Financial Professional

- √ 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?