



**Spectrum Asset Management, Inc./SAMI Brokerage LLC**  
**Form CRS - Customer Relationship Summary**  
**March 31, 2023**

Spectrum Asset Management, Inc. (“Spectrum”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. SAMI Brokerage LLC (“SAMI”) is a broker-dealer registered with the SEC and a member of FINRA. SAMI is a wholly owned affiliate of Spectrum. Brokerage and investment advisory services and fees differ and it is important that you understand these differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

**What investment services and advice can you provide me?**

***Investment Adviser***

Spectrum offers investment advisory services to a wide range of client types, including retail investors, through mutual funds, separately managed accounts and wrap fee programs. Our accounts focus on preferred securities and other junior subordinated capital securities.

**Monitoring**

We continuously monitor your investments. We utilize various analytical frameworks to determine which investment strategies best serve our clients’ needs. The monitoring we provide is part of the investment advisory service included in your management agreement.

**Investment Authority**

Our clients typically grant us discretionary authority to manage their accounts. This means we can buy and sell investments on behalf of our clients without seeking permission on a trade by trade basis. You may provide reasonable restrictions on our discretionary authority to us in writing. You make the ultimate decision regarding the purchase and sale of investments in a non-discretionary arrangement.

**Limited Investment Offering**

Spectrum accounts focus on preferred securities and other junior subordinated capital securities.

**Account Minimums and Other Requirements**

We generally require a minimum initial account size of \$25 million for portfolio management services, however, the minimum account size is negotiable or may be waived at our discretion. Assets of family members are aggregated for the purpose of meeting this minimum.

***Broker-Dealer***

SAMI exclusively executes purchases and sales of securities for investment accounts managed by Spectrum. Spectrum has full discretion regarding the purchase or sale of investments. SAMI does not make any recommendations and does not offer account monitoring. Any limitations on investments, account minimums or other account requirements would be set by Spectrum.

**Additional information** about Spectrum services is available on Part 2A of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/300463>.

**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?

### *Investment Adviser*

We charge a percentage of assets under management, which typically includes cash and cash equivalents, for portfolio management services. Fees are negotiable depending on the size and complexity of each client's accounts. These fees are charged on a quarterly basis, in arrears. You should be aware that the more assets there are in your account, the more you will pay in fees. This means we have an incentive to encourage you to increase the assets in your account. In very limited circumstances, we may charge a negotiated performance fee. More information about our fees are included in Item 5 of our Form ADV, Part 2A available at <https://adviserinfo.sec.gov/firm/summary/300463>.

In addition to Spectrum's investment management fee, clients bear additional fees and costs related to your account such as custodian fees, transaction costs (commissions to brokers), and wire transfer and electronic fund fees.

### *Broker-Dealer*

Depending on the product, you will pay transaction-based fees (commissions) when certain securities are purchased or sold. A retail investor will pay more in commissions if more purchases are made in a brokerage account and the firm may have an incentive to trade more often.

**Additional information:** 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. More information about Spectrum services is available on Part 2A of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/300463>.

**Ask your financial professional** - Help me understand how these fees and costs might affect my investments? If I give you \$10,000,000 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 broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

### *Investment Adviser*

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 investment personnel have an incentive to invest for personal gain in the same securities in which they invest for clients. This creates an incentive to take advantage of information or the timing of investment decisions on behalf of client accounts for personal benefits. We have policies and procedures in place to address this conflict.
- We have an incentive to favor affiliated accounts over your account when making investment decisions. We recognize our duty to treat all accounts fairly and equitably over time and we have policies and procedures in place to address this conflict.
- We have an incentive to use our affiliated broker/dealer to execute transactions in your account since we financially benefit from the commissions charged for such transactions. We have policies and procedures in place to address this conflict.

### *Broker-Dealer*

We do not provide recommendations as your broker-dealer. SAMI executes trades for the discretionary accounts managed by Spectrum. As Spectrum is affiliated with SAMI there is an inherent conflict of interest on the commissions received based on trades directed by Spectrum. We have policies and procedures in place to address this conflict.

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

**Additional information** about conflicts of interest between Spectrum and its clients is available on Part 2A of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/300463>.

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

Our financial professionals for Spectrum and SAMI receive a salary and may receive a discretionary bonus based on individual performance, the success of the firm, and the total amount of our firm's assets under management .

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

Firm – Yes, Financial professionals – No. Visit <https://www.investor.gov/CRS> for a free and simple search tool to research us and our financial professionals.

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

**Additional information about our services** can be found at <https://adviserinfo.sec.gov/firm/summary/300463>. If you have any questions about the content of this brochure or would like to request a copy of this Relationship Summary, please contact Joseph A. Hanczor at (203) 321-1134.

**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?