

Great Northern Asset Management, Inc.
d/b/a: Lyons Investment Management
June 19, 2020

FORM CRS

Lyons Investment Management is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. 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.

What investment services and advice can you provide me?

We offer the following investment advisory services to retail investors: **Portfolio Management Services and Portfolio Manager to a Wrap Fee Programs**. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Brochure clicking this link <https://adviserinfo.sec.gov/firm/brochure/166788>. Refer to Items 4, 7, 8, 13 and 16.

Account Monitoring: If you open an investment account with our firm, as part of our standard service we will monitor your investments on an ongoing basis.

Investment Authority: We manage investment accounts on a **discretionary** basis whereby **we will 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) by providing our firm with your restrictions and guidelines in writing.

Investment Offerings: We offer advice on the following types of investments or products: domestic and foreign, equity securities, warrants, money market funds, exchange traded funds and foreign currencies.

Account Minimums and Requirements: In general, we require a minimum account size based on the investment strategy selected, to open and maintain an advisory account, which may be waived at our discretion.

Key Questions to Ask Your Financial Professional

- **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?**

What fees will I pay?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6, by clicking this link <https://adviserinfo.sec.gov/firm/brochure/166788>.

- **Asset Based Fees** - Payable quarterly in advance based the total account asset value on the last trading day of each calendar quarter. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets;
- **Performance-based Fees** - Payable annually in arrears, if applicable. Performance-based fees create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement. Since we manage both accounts that charge a performance-based fee and accounts that are charged another type of fee, we have an incentive to favor accounts for which we receive a performance-based fee;
- Clients may also pay additional fees and/or expenses. Examples of the most common fees and costs applicable to our clients are:

- Custodian fees;
- Account maintenance fees;
- Fees related to mutual funds and exchange-traded funds;
- Transaction charges when purchasing or selling securities; and
- Other product-level fees associated with your investments.

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 Questions 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 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.

- ***Revenue Sharing:*** We have a revenue sharing arrangement with Morgan Stanley Wealth Management ("Morgan Stanley"), as we are a portfolio manager to a wrap fee program sponsored and administered by Morgan Stanley. We receive a portion of the advisory fees for accounts we manage through Morgan Stanley's Wrap Fee Program. Revenue sharing arrangements present certain conflicts of interest due to the fact that we may be incentivized to recommend Morgan Stanley's Wrap Fee Program.

Refer to our Form ADV Part 2A, Item 5, 10, 12 and 14, by clicking this link <https://adviserinfo.sec.gov/firm/brochure/166788> to help you understand what conflicts exist.

Key Questions to Ask Your Financial Professional

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

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated through the following ways: salary, bonus or via a percentage of the revenue the firm earns from the financial professional's advisory services or recommendations. Financial professionals' compensation is based on the overall revenue of the firm and the individual's contribution to the firm's success. The bonus compensation paid to our financial professionals involves a conflict of interest because they have a financial incentive to refer clients to our firm.

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

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

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 your investment advisory services and request a copy of the relationship summary at 386-775-1177 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/166788>.

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?**