

Item 1. Introduction

Allen C. Ewing & Co. is registered with the Financial Industry Regulatory Authority (FINRA) and the Securities and Exchange Commission (SEC) as a broker dealer and is a member of the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. 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.

jhh wealth, llc is an affiliate of Allen C. Ewing & Co. and is registered with the Securities and Exchange Commission (SEC) as an investment advisor.

Item 2. Relationships and Services: What investment services and advice can you provide me?

- We sell and make recommendations to retail investors for limited investment offerings with direct issuers of mutual funds, annuities and insurance based products. We also sell and make recommendations of private placements to accredited investors. We will monitor accounts on a periodic basis and as requested by the client, which is offered as a part of your standard services.
- We also have registered representatives that may be dually registered with jhh wealth, llc, an SEC registered investment advisor. Investment advisory services are offered through jhh wealth, where you may choose an advisory account that allows them to buy and sell investments in your managed account (including the type and amount of such investments) without asking you in advance (“discretionary account”) or they may give you advice on a non-discretionary basis where you are responsible for the ultimate decision regarding the purchase or sale of investments (“non-discretionary account”). Each client designates its account as either a discretionary account or a non-discretionary account in its investment advisory agreement with jhh wealth (including any restrictions or limitations on our investment authority).
- Minimum account values are determined based on the type of investment and in most cases is provided by the issuer, but in general our clients are accredited high net worth investors.

For additional information, please visit www.allenewing.com

CONVERSATION STARTER *Ask your financial professional–*

- *Given my financial situation, should I choose a brokerage 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?*

Item 3. Fees, Costs, Conflicts and Standard of Conduct: What fees will I pay?

Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay. Commissions are paid to the firm and/or your financial professional based on the terms of the issue, private placement, mutual fund, annuity or insurance based product. Accounts that are managed by the affiliate investment advisory firm in general, investment advisory fees are comparable to the account size and client, which are served and payable quarterly in advance. In addition to our fees, you may be responsible for other fees and expenses associated with the investment of your assets. Such other fees and expenses may include brokerage commissions and other transaction costs, fees charged by your custodian, issuer, exchanges, and taxes. You may also pay the fees and expenses associated with investment advice provided by third parties, including advisory fees charged by third-party managers, management and performance fees and expenses charged by private investment funds, and fees and expenses of mutual funds, annuities and exchange-traded funds in which you invest.

Allen C. Ewing & Co.: Form CRS Customer Relationship

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 investment over time. Please make sure you understand what fees and costs you are paying.

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CONVERSATION STARTER. 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 broker dealer? How does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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.

- Transaction based fees could pose a conflict for a retail investor because you are charged more when there are more trades being processed in your account. This may motivate a firm to encourage the investor to trade more often.

When associates act as your investment advisor, through our affiliate, 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.

- For accounts managed by the firm's affiliate, jhh wealth, llc, the more assets you have in your advisory account, including cash, the more you will pay in the form of advisory fees and other asset-based fees. Therefore, there exists an incentive to increase the assets in your account in order to increase the fees.

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CONVERSATION STARTER. 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?*

Our financial professionals are independent contractors of the firm and make money via commission on transactions placed on behalf of our clients. The commissions are determined by each issuer and may vary by issuer and product. Professionals paid through our affiliate investment advisory firm are paid a percentage of the quarterly management fees collected by the firm from your account.

Item 4. Disciplinary History: *Do you or your financial professionals have legal or disciplinary history?*

Yes. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTER. Ask your financial professional –

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

Item 5. Additional Information

For additional information about our broker dealer or our financial professionals, you may access information at www.brokercheck.finra.org. If you would like additional, up-to-date information or a copy of this relationship summary, please call us at (904) 354-5573 or visit our website at www.allenewing.com.

CONVERSATION STARTER. 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?*