

**Item 1: Introduction**

NEIRG Wealth Management, LLC (“NEIRG”) 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://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2: What investment services and advice can you provide me?**

NEIRG is a fiduciary and has an obligation to act in the best interest of our clients. We offer the following investment advisory services to retail investors: **Financial Planning Services; Portfolio Management Services; Pension Consulting Services; Selection of Other Advisers; Asset Allocation Services; and Advisory Consulting Services.** Detailed information regarding our services can be found in our Form ADV Part 2A (see Items 4, 7, and 8).

*Account Monitoring:* If you open an investment account with our firm, as part of our standard service we will monitor your investments on a daily 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. We also offer *non-discretionary* investment management services whereby we will provide advice, but *you will ultimately decide* which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

*Investment Offerings:* We offer advice on the following types of investments or products: equity securities, warrants, corporate debt securities (other than commercial paper), certificates of deposit, municipal securities, variable annuities, mutual fund shares, United States government securities, options contracts on securities, options contracts on commodities, futures contracts on tangibles, futures contracts on intangibles, money market funds, REITs, structured notes, ETFs, private placements, interests in partnerships investing in real estate and interests in partnerships investing in oil and gas interests.

*Account Minimums and Requirements:* In general, we require a minimum dollar amount of \$200,000.00 to open and maintain an advisory account but under certain circumstances we may waive the minimum account size requirement and accept accounts less than \$200,000.00; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

**Conversation Starters. 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?**

**Item 3: What fees will I pay?**

Fees and Costs (Paid to NEIRG): The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information regarding our fees and costs, refer to our Form ADV Part 2A (see Items 5 and 6).

- *Asset Based Fees:* Payable quarterly in advance. Clients have the option of paying as invoiced by NEIRG or through a direct debit from their account. Since the fees we receive are asset-based (i.e., based on the value of your account), the more assets there are in your advisory account, the more you will pay in fees, which presents a conflict and an incentive to encourage you to increase the assets in your account.
- *Hourly and Fixed Fees:* The Firm negotiate hourly fees and/or fixed fees in certain circumstances for its Investment Advisory and/or Financial Planning services. These fees may be payable on a fixed fee or hourly basis as provided in the client agreement. Hourly engagements present a conflict and incentive for our firm to maximize the hours spent on your account, while fixed fee engagement present a conflict and incentive for us to minimize the hours spent on your account.

- *Other Fees and Costs (Paid to Third Parties):* Examples of the most common fees and costs applicable to our clients and related to our advisory accounts are: custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund fees, account maintenance fees, fees related to mutual funds and exchange-traded funds, transaction charges when purchasing and 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.*

**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 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.*

- The affiliated private investment funds that we manage pay us management fees that are higher than the advisory fees clients pay for their other assets managed by us. This gives us an incentive to recommend that our clients allocate their assets to the affiliated private investment funds over other investments.
- We and our affiliates refer clients to third-party service providers and are eligible to receive additional compensation for those referrals.

Refer to our Form ADV Part 2A, Items 4, 5 and 10 for more information about our conflicts of interest.

**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?**

The financial professionals servicing your account(s) are compensated in the form of salary and bonus. The factors primarily driving the salary and bonus for each financial professional include the amount of client assets serviced by the financial professional, and the revenue the firm or an affiliate generates from the professional's services or recommendations. This presents a conflict and incentive for the financial professional to encourage you to increase the assets in your account or recommend certain services offered by our affiliates. For more information, refer to our Form ADV Part 2A, Items 4, 5 and 10.

A number of our financial professionals may be eligible for additional compensation from our indirect parent company, Focus Financial Partners, LLC (or one of its affiliates), depending on NEIRG's revenues. This provides an incentive for these financial professionals to encourage you to maintain and even increase the size of your investment account with us. See Item 5 of your financial professional's Part 2B Brochure Supplement for more information about your individual financial advisor's compensation.

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

Yes. You can access [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple tool to research our firm and its 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 investment advisory services, and to request a copy of Form CRS, please contact our Chief Compliance Officer at [info@neirg.com](mailto:info@neirg.com) or 978-975-2559.

**Conversation Starters. 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?**

## **EXHIBIT 1**

### **FORM CRS – SUMMARY OF MATERIAL CHANGES**

November 22, 2021 – We revised the conflicts discussion in the private investment funds example and insurance products example under Item 3 of this Form CRS.