



## Form CRS (Part 3 of Form ADV) for Matson Money, Inc.

Matson Money, Inc. (Matson) is registered with the SEC as an investment adviser. Investment advisory and brokerage services and fees differ, and it is important to understand the differences. For free and simple tools to research advisers, broker-dealers and financial professionals and educational materials click [HERE](#).

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

We offer discretionary asset allocation advice to retail investors and educational and training programs. We use one of three investment programs to allocate your assets among various mutual funds managed by us (“Matson Funds”) or by third-party advisers. As a discretionary adviser, we have the ability to add, remove or replace securities without first consulting you. We base our investment decisions on your responses to a questionnaire completed upon opening an account with us. In certain investment programs, you can impose limited restrictions on our discretion; however, we can refuse to manage your account based on your questionnaire responses or requested restrictions. Our services are marketed primarily through registered investment advisers (“Co-Advisors”) and broker-dealers and solicitors (collectively, “Referrers”). We are the only discretionary adviser over accounts you maintain with us. As a standard service, we monitor accounts on an ongoing basis and review them for rebalancing at least quarterly. Changes to portfolios are made infrequently based on changes that we consider significant in academic research and data, quantitative analytics, the tax code, management of the securities in the portfolio, and/or your personal circumstances, including health, employment, marital and family status. The monitoring we provide is in addition to any monitoring provided by Referrers. Additional information can be found in our Form ADV Part 2 Brochure (“Brochure”) Items 4-5, 7, and 13, click [HERE](#).

***You can ask us: 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?

You will be assessed fees based on which of the three program(s) you participate in.

**Matson Fund Platform and/or the Frontier Adjusted Portfolio Platform:** These programs invest primarily in Matson Funds. Shareholders will bear their pro rata share of the fees and expenses of these Matson Funds, including brokerage fees, operating expenses, underlying fund expenses and advisory fees. We receive and retain an advisory fee from the Matson Funds. We receive a maximum annual fee rate of 0.50% on each Fund’s average daily net assets. As funds of funds, the Matson Funds invest in shares of other registered investment companies. Advisers to these underlying funds are paid an advisory fee by such underlying funds. Thus, Clients bear their asset-based share of the fees and expenses of each underlying fund as well as of the Matson Fund in which their assets are invested. Neither we, nor any other party, receive a sales load in connection with Client investments in the Funds. Matson does not “double dip” advisory fees, meaning that Clients do not pay Matson any separate advisory fee to participate in these programs above or beyond the advisory fees charged to the Matson Funds. Clients pay fees to Referrers, including our affiliate Matson Capital, LLC (Matson Capital), separate and apart from the fees and expenses associated with the Funds. These fees are collected by Matson and remitted to Referrers. Matson retains no portion of these fees. Historically, these fees generally ranged from 0.25% to 1.4% of client assets under management; however, Matson has reduced the maximum allowed Referrer fee for all new clients to 1.2% of client assets under management. This fee is agreed to either in the Co-Adviser’s tri-party contract or the separate Matson contract for solicited clients. These fees are charged quarterly in advance. Fees are generally based upon the value of an account as of the last business day of each quarterly period. However, during the quarter we refund a portion of your fee for withdrawals from your account (on a prorated basis) and we charge an additional fee for additions to your account (on a prorated basis). We will make any applicable refunds or collect additional fees within 90 days of our receipt of notice of each withdrawal or addition. Click [HERE](#) for additional information (Items 4, 5, and 6).

**Private Account Asset Allocation:** This program invests primarily in third party-managed mutual funds managed by a third party. In addition to your pro rata share of each fund’s fees and expenses, you will pay fees to us based on the assets in your account at a rate that decreases as assets increase. This program is available on a limited basis. Fees are payable quarterly in advance based on quarter-end account value. Click [HERE](#) for additional information (Items 4 and 5).

**Referrer Fees:** For each program, you will pay fees to your Referrer directly or indirectly. Such fees are subject to a maximum amount, as described in our Brochure, and are charged quarterly in advance. Under the Private Account Asset Allocation program, we pay Referrers a portion of the advisory fee that we receive from you. Friends and family who do not come to us through Referrers may pay lower fees for the same advisory services.

**Other Fees and Costs:** You will incur other costs like brokerage commissions or other transaction and custodial fees.

**Conflicts of Interest:** Depending on the program, we invest your assets primarily in mutual funds advised by us or third parties we select. You will bear your pro rata share of the fees and expenses of these mutual funds. If such mutual funds are advised by us, this creates a conflict of interest because we are incentivized to invest your assets in Matson Funds to increase the assets in those funds, which increases the amount of advisory fees that we receive. In addition, the third-party advisers assist us with our marketing efforts and in some cases provide research assistance in connection with our investment strategies. This creates an incentive for us to invest in mutual funds advised by third-party managers who provide us with greater benefits. Dimensional Fund Advisors LP (DFA) has historically provided certain exclusivity arrangements with us to prohibit Referrers from purchasing DFA mutual funds for Referrers' other, non-Matson clients. Additionally, DFA's Co-Chief Investment Officer and Global Head of Research serves as a member of Matson's Academic Advisory Board. 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. Additional information can be found in our Brochure, Items 4-5, click [HERE](#).

**You can ask us:** *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.

Depending on the program, we can recommend the Matson Funds, from which we receive advisory fees. We do not receive any additional advisory or sales-related compensation in connection with recommending and selecting these funds. The recommendation of Matson Funds creates a conflict of interest because we are incentivized to invest your assets in Matson Funds in order to increase the assets in those funds, which increases the advisory fees we receive from the Funds. Matson Capital has an incentive to refer Clients to us because our shared owner benefits from our receipt of such fees. Additional information can be found in our Brochure, Item 14, click [HERE](#).

**You can ask us:** *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

Matson personnel receive salaries and, in Matson's discretion, year-end bonuses. Year-end bonuses are generally based on Matson's overall financial performance. A conflict of interest exists because Matson personnel can receive a bonus based partially on Matson's overall assets under management, giving personnel an incentive to retain Client assets and add new assets. Certain such personnel are shared with Matson Capital. Other Referrers are not employees of, or affiliated with, us.

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

No. For a free and simple search tool to research us and our financial professionals click [HERE](#).

**You can ask us:** *As a financial professional, do you have any disciplinary history? For what type of conduct? 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?*

To obtain additional information about our services, a copy of this relationship summary or up-to-date information, please click [HERE](#) or contact us at (513) 204-8000 or [info@MatsonMoney.com](mailto:info@MatsonMoney.com).