



Form CRS – January 25, 2022

Introduction

Barton Investment Management, LLC (referred to as “we” or “us”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Our financial professionals (“professionals”) offer investment advisory services to our clients. It is also important that you understand the investment advisory services we offer, the fees charged and the conflicts of interest that exist when we provide those services.

Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about investment advisers and investing.

What investment services and advice can you provide me?

We offer portfolio management services to our retail clients. Portfolio management services involve providing you with continuous advice, or investing your account, based on your specific circumstances.

We offer our portfolio management services on a discretionary basis. “Discretionary basis” means that we will make investment decisions for your account, without requiring your pre-approval on an ongoing basis. Our investment decisions are based on reasonable limitations set by you.

We will monitor your account.

To invest with us, we, generally, require a minimum account balance of \$1,000,000 in assets under management. However, there are times we may decide to make an exception.

For additional information including minimum investment amounts, please see our Form ADV, 2A brochure (specifically, items 4.A. and 5), available at <https://bartonim.com/>.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, our firm is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable.

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?*

What fees will I pay?

It is important that you understand the fees associated with our services. These fees are outlined below, but do not include brokerage commissions, transaction fees, and other related costs and expenses, which you will be responsible for paying. Certain investment types also have additional fees. For instance, mutual funds and exchange-traded funds charge internal management fees.

We charge an annual rate of 1.0% on the first \$5,000,000 of assets under management and .8% for assets under management exceeding \$5,000,000. The more assets there are in your account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account. Subject to your prior approval, we deduct these fees from your account, each quarter, in advance. Our fees are non-negotiable.

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At times, we maintain accounts, that we would not ordinarily maintain, as a matter of convenience for our clients. We charge an additional and different fee for monitoring those accounts.

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.

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically, items 5.A., B., C., and D.) which can be found at <https://bartonim.com/>.

Conversation starters: 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.

We receive an advisory fee based on the assets you have under management with us. The more assets you have under management with us, the larger your advisory fee will be. This creates an incentive to encourage you to increase your investment account size.

If we recommend that a client roll over retirement plan assets into an account to be managed by us, such a recommendation creates a conflict of interest if we will earn an advisory fee on the rolled over assets. No client is under any obligation to rollover retirement plan assets to an account managed by us.

For additional important disclosures regarding asset roll-overs, please see our Form ADV, 2A brochure (specifically, items 4 and 8), available at <https://bartonim.com/>.

Payment of referral fees by us to other individuals or entities creates a conflict of interest because such referrals may not be unbiased and, at least, partially driven by a financial incentive.

For additional important disclosures regarding client referrals, please see our Form ADV, 2A brochure (specifically, item 14), available at <https://bartonim.com/>.

Conversation starters: Ask your financial professional:

- How might your conflicts affect me and how do you address them?

How do your financial professionals make money?

Your financial professional will receive a salary and a discretionary bonus based on the firm's overall performance and earnings. This creates an incentive for financial professionals to increase our earnings by encouraging you to increase your investment account size, including by rolling over assets from outside accounts.

Your professional is legally required to act in your best interest and not put his or her interests ahead of your own. We have systems in place to mitigate the conflicts of interest that arise from the way he or she makes money, including systems to review whether a recommendation is in your best interest.

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically, items 5.A., B., C., and D.) which can be found at <https://bartonim.com/>.

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

No. Neither our firm nor our financial professionals have any legal or disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation starters: Ask your financial professional:

- Do you have any disciplinary history? If so, for what kind of conduct.

Additional Information

You can find additional information about our services, up-to-date information and request a copy of the relationship summary or our Form ADV, Part 2A Brochure, by visiting <https://bartonim.com/>; emailing at janna.forte@bartonim.com or calling us at 610.226.4040.

Conversation Starters: Ask your financial professional:

- Who is my primary contact person? Is he or she a representative of a broker-dealer or an investment adviser? Who can I talk to if I have concerns about how this person is treating me?