

Item 1 – Cover Page

Deem Asset Management, LLC
Firm CRD # 315845
Anthony J. Deem, President & Chief Compliance Officer

Form ADV Part 2A: Firm Brochure

2492 Country Club Dr.
Uniontown, Ohio 44685

Phone: (330) 685-1975
<https://deemasset.com/>

Effective: April 30, 2025

This program brochure provides information about the qualifications and business practices of Deem Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at (330) 685-1975 or a@deemasset.com

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Deem Asset Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

Pursuant to SEC Rules, we will deliver you a summary of any material changes to this and subsequent brochures at least annually or as necessary to ascertain information herein remains current.

Clients may access a current brochure at www.adviserinfo.sec.gov.

Added the following disclosures located at:

Form ADV Part 2A, Item 1

Form ADV Part 2A, Item 4

Form ADV Part 2B, Item 1

The business address changed to 2492 Country Club Dr., Uniontown, Ohio 44685.

Item 3 - Table of Contents

Form ADV Part 2A - Firm Brochure

Item 1	Cover Page.....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents.....	3
Item 4	Advisory Business.....	4
Item 5	Fees and Compensation.....	5
Item 6	Performance-Based Fees and Side-By-Side Management.....	6
Item 7	Types of Clients.....	7
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9	Disciplinary Information.....	10
Item 10	Other Financial Industry Activities and Affiliations.....	10
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	10
Item 12	Brokerage Practices.....	10
Item 13	Review of Accounts.....	12
Item 14	Client Referrals and Other Compensation.....	13
Item 15	Custody.....	13
Item 16	Investment Discretion.....	13
Item 17	Voting Client Securities.....	14
Item 18	Financial Information.....	14
Item 19	Requirements for State-Registered Advisers.....	14

Form ADV Part 2B - Brochure Supplement

Item 1	Cover Page.....	16
Item 2	Educational Background and Business Experience.....	17
Item 3	Disciplinary Information.....	17
Item 4	Other Business Activities.....	17
Item 5	Additional Compensation.....	18
Item 6	Supervision.....	18
Item 7	Requirements for State-Registered Advisers.....	18

Item 4 – Advisory Business

Description of Firm

Deem Asset Management, LLC (herein referred to as “the firm”, “we”, or “us”) is based in Uniontown, Ohio and also operates in North Canton, Ohio. The firm is an Ohio LLC founded by Anthony J. Deem, President and Chief Compliance Officer (“CCO”). It became registered in 2022. The firm is located at 2492 Country Club Dr., Uniontown, Ohio 44685. The firm provides asset management advisory services for portfolios of securities and other asset consulting services to its clients.

Ownership

Anthony J. Deem is the only member of Deem Asset Management, LLC. He is responsible for day-to-day operations including client engagement, compliance, marketing, portfolio management, consulting, securities research, information technology, accounting, administration, and more.

Types of Advisory Services Offered

The firm provides fee-based investment advisory services and manages portfolios of securities and assets such as stocks, derivatives, mutual funds, Exchange Traded Funds or ETF’s, fixed income securities, and more. Additionally, we offer asset management consulting services for held-away accounts, personal financial planning, and other services such as real estate rental analysis. We do not maintain custody of client funds or securities. There is no minimum investment required for any of our services. There is no lock-up period for client funds and investments. We do not offer a wrap fee program. All clients are required to agree to terms outlined in an advisory agreement.

Traditional Asset Management Services (“Traditional”): We service individual accounts that allow limited discretionary authority to invest client funds across a spectrum of suitable investments. Clients will have separate service agreements with Charles Schwab who will act as broker-dealer and custodian. Item 5 – Fees and Compensation provides greater detail on fees and expenses. Individual goals, risk tolerance, suitability, and strategy are determined in a profile for each client. Profiles include an investment strategy statement. Written authorization in client agreements provides the firm with limited discretionary authority over client accounts to trade in securities.

Asset Management Consulting: The firm offers several consulting services and is compensated through billable hourly labor.

- **Fee Advice:** A service for clients who wish to have a portfolio of investments managed separate from our firm. Services include the following: 1) Professional Security Analysis; 2) Personal Financial Planning; 3) Estate Planning; 4) Retirement Planning; 5) Investment Portfolio Weighting / Rebalancing Review; 6) Private Business Analysis; 7) Industry Analysis; 8) Valuation Analysis; 9) Real Estate Investment Analysis; 10) General Asset Analysis; or 11) Other Forms of Tailored Financial Planning or Advisory Services.
 - **Personal Financial Planning Services:** Clients receive financial planning data, projections and a document which reviews focus areas, asset locations, net worth projections, goals, and action items.
- **Public Speaking Engagements:** A fee generated by a representative of the firm speaking publicly about a topic. The fee includes time committed to preparation, delivery, and follow-up activity.

- **Content Creation:** A fee generated by a representative of the firm for writing articles or other types of content for a client. The fee includes time committed to content creation, including research and a time log for the writing process.

The firm customizes advisory services to the individual needs of clients. Clients may impose restrictions on certain securities or types of securities. Client portfolios are managed on a limited discretionary basis in accordance with pre-determined investment objectives or needs requiring customized asset allocation weightings aligned with individual risk tolerance and suitability. Most clients are required to complete an initial application which provides the firm with personal financial information such as income, assets, liabilities, net worth, risk tolerance, investing experience and other relevant personal financial information. Exceptions to this application requirement may be granted if it is determined an individual is an accredited or sophisticated investor. Clients are expected to communicate any changes in risk tolerance or investment objectives prior to any periodic review sessions.

As of March 17, 2025, Deem Asset Management managed \$9,255,509 in assets on a discretionary basis and \$0.00 on a non-discretionary basis. Total asset values include accrued income.

Item 5 – Fees and Compensation

Portfolio Management Services: The firm has a single rate qualified tier approach to payment which applies a percentage across the whole value of the account, irrespective of asset types held. With written authorization from a client, fees will be deducted by a custodian during the first calendar or business day of each quarterly period before market open. Base fees will be calculated on a pro-rated basis dependent upon timing of capital inflows and outflows. Clients may not pay fees in advance based on any estimates. Fees are negotiable. Quarterly statements are available, and clients should verify accuracy of fee calculations when reviewing statements.

The firm intends to use safeguards in the State of Maine for residents with fees directly deducted from accounts. Clients may waive their right to an itemized invoice each quarter. The waiver in Maine must describe the right being waived and must be on a document that does not address any other matter. Otherwise, itemization of the fee must be sent each quarter which includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee. Other states where the firm operates under de minimis exceptions often do not provide the right to waive an itemized invoice.

The firm and its representatives are compensated from charging a percentage of the value of assets under management (AUM).

- **Traditional Asset Management:** Base fees are calculated at an annualized rate of 1.5% of total account assets, unless negotiated otherwise.

Asset Management Consulting Service: The firm charges \$125 an hour for consulting services after an initial consultation. The fee represents direct compensation for an investment advisor representative at the Firm. This rate is non-negotiable and will not change unless a client agrees to such modification. Clients should recognize comparable services from other advisory firms could be provided at a lower cost.

- Clients may pre-pay an estimate of no more than \$500 for a consulting contract 6 months in advance and can obtain a refund of the fee within 60 days after contract termination. The amount of the refund is calculated as total fees pre-paid minus billable hourly charges from completed contract advisory work assessed by a firm representative. Invoices are provided to clients monthly for advisory fees incurred.

Additional Disclosure on Fees and Compensation: The firm is not a broker-dealer nor is it compensated for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, or any other transactional activity at Charles Schwab or with any other broker/dealer or custodian. Therefore, we do not see specific asset allocation options, broker-dealer, or custodian choice as potential areas where conflicts of interest may arise in relation to incentive to recommend investment products based on compensation potential.

Clients have the option to purchase investment products that the firm recommends through other brokers or agents that are not affiliated. Each investor has their own account on Charles Schwab. Management of client capital is not taking custody of assets. Client investments and funds are always accessible to liquidate and withdrawal from Deem Asset Management accounts.

Multiple accounts at one household may request consolidated account reporting if it's the same mailing address, unless explicitly stated as not eligible in the advisory agreement.

Clients will pay separate fund fees, fund expenses, brokerage commissions, custodian costs and other transaction related fees directly to Charles Schwab or other broker/dealer or custodians. For example, a client invested in a mutual fund, index fund or ETF might be charged separately by the fund for management fees associated with the fund's operating expenses, which can be found in the fund's prospectus.

Charles Schwab broker-dealer commissions and fees incurred in most stock-based transactions are typically \$0.00 or are otherwise inexpensive for exchange-listed securities. Clients should note the buying and selling of certain securities or derivatives such as U.S. OTC listed securities, Canadian stock transactions, or options, if applicable, may carry a higher transaction cost typically through a commission from the broker-dealer to our clients. Other non-advisory fees clients may experience include margin loan interest and stock borrow fees, per bond transaction fees on secondary market trades in fixed income, and electronic fund transfer fees.

Additional information on these fees can be found in client agreements and/or separate service agreements with these providers.

Initial consultation is free for all clients for all services provided. Clients will agree to their agreement, profile and strategy statement based on suitability and risk assessment prior to allocating capital. More information on strategy and risk can be found in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.

The firm does not charge administrative or custodian fees. Included in our fee-based services are time and expenses incurred on planning, communicating, implementing, and maintaining a client's investment strategy. The firm reserves the right to recommend a consulting agreement, renegotiate fees or deny ad-hoc requests. For example, a client may want to buy a stock or other security but seeks time-consuming, in-depth research to explore the merits of allocation. This may result in an hourly service charge if a client agrees to the work and signs an Asset Management Consulting agreement.

Clients for Asset Management Consulting and those who may direct brokerage to non-Charles Schwab broker/dealers with custody will be directly billed for advisory fees.

Item 6 - Performance-Based Fees and Side-By-Side Management

The firm and its representatives do not seek to be compensated by a performance-based fee, which is a fee collected based on a share of capital gains on or total appreciation of assets. This form of compensation

has applied to our services in the past. Our Qualified Asset Management service was discontinued in February 2024.

Ohio Administrative Code prohibits the Firm from receiving any type of advisory fee calculated as a percentage of capital gains or appreciation in the client's account. This prohibition extends to contingent fee arrangements, including contracts that provide for the fee to be waived or reduced if certain performance levels are not met. This prohibition does not apply to certain clients such as those who verified having at least \$1.1 million under the management at the Firm, or if the client has a net worth of more than \$2.2 million excluding the value of the client's personal residence.

Item 7 - Types of Clients

The firm may provide services for individuals, high net worth individuals, small businesses, corporations, profit sharing plans, foundations, charities, other non-profits, institutional investors, pension plans, other institutions/funds, other businesses, trusts, estate accounts and retirement plans.

The firm does not have a minimum account size.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

The firm provides investment recommendations and transacts in various asset classes for clients after evaluation of client risk tolerance and suitability. As a result, methods of analysis, investment strategy and risk exposure vary from client to client due to suitability differences.

Client securities transactions are exclusive with Charles Schwab unless brokerage is directed by the client. Trading and other transactional activity will cause clients to incur fees or expenses outside of advisory fees from our firm.

Investing in securities carries a risk of losses that clients should be prepared to bear. Clients should understand the risks and volatility associated in each market they invest in. Assets under management at the firm could result in greater volatility versus underlying markets.

- **Stocks, Mutual Funds, ETFs, Other**
 - Method of analysis and strategy:
 - We use AI in equity research as part of our due diligence process when evaluating companies and industries to invest in. Our AI tools assist in the analysis of financial data and market trends. However, all final investment decisions are made by a financial advisor.
 - We do not claim to be an "AI advisor". Personal client data is not shared with large language models or other AI companies outside our network. In the future, the firm plans to publicly introduce internally developed investment research and advisory tools in states where we have active registration. The proprietary technology is under development and does not involve private client data.
 - The firm will implement or make changes in a portfolio to optimally weight client risk tolerance and investment objectives. We may buy or sell securities because of market volatility, individual security valuation, profit and cash flow forecasts, dividend payout potential, growth vs. value analysis, sector rotation timing, client tax strategy, or to rebalance risk exposure in asset classes.
 - We may hedge suitable portfolios that are long, i.e. investment value grows when prices appreciate, with put options, ETF's or shorting of individual stocks. We

may also sell securities or temporarily recommend hedging a portfolio by moving into cash in downward markets.

- For mutual funds, we will evaluate historical performance, portfolio managers, fees, and other criteria as necessary.
- Accounts with frequent trading can experience a negative impact in net investment return performance through greater brokerage and transactions expenses, as well as higher taxes. Traditional Asset Management client accounts may see frequent trading depending on portfolio factors and suitability.
- Material risks involved:
 - There are no guarantees of income or capital appreciation when you buy securities such as stock in a company or an ETF. Securities can lose some or all their value. Mutual funds can lose some or all value as securities held by a fund can lose value. Dividends or interest payments are also subject to change based on market conditions that can negatively impact investment performance.
- **Fixed Income:**
 - Method of analysis and strategy:
 - Clients can invest in bonds, bond funds and ETFs, CDs, and preferred securities. Strategies will vary by client based on needs related to preferential tax advantages, income dependability and predictability, a need to smooth out investment returns, savings and retirement goals, capital preservation, and portfolio diversification.
 - We may employ ladder strategies for clients who want to secure predictable income of bonds with flexibility to reinvest if rates go up.
 - We may employ a barbell strategy to divide the allocation of bonds between short and intermediate term maturities to maximize the benefits of each, i.e. long-term provides income, short-term provides liquidity to reinvest.
 - Material risks involved:
 - The market value of fixed income securities and bonds can decline. We believe the primary risks involved in fixed income investing include interest, credit, inflation and call risk. More information on these risks can be found at <https://www.schwab.com/bonds/faqs>
- **Cryptocurrencies / Crypto Assets:**
 - Method of analysis and strategy
 - The firm may not engage in advisory, consulting or effecting transactions in crypto assets outside of registered securities. A change to this strategy is dependent on regulatory clarity from the SEC, Ohio or Maine.
 - Exposure to the mainstream crypto markets is typically gained through an account such as Coinbase. After an internal review, these exchanges are found to be trading securities that are unregistered and non-exempt, which is a prohibited activity at our firm. To avoid future unfavorable enforcement action potentially retroactive in nature, clients may only gain exposure to crypto assets through registered securities such as a Bitcoin ETF.
 - The firm evaluates investing in crypto assets based on liquidity, momentum and popularity in marketplace, software project viability and potential, software development milestone visibility and achievement as well as general market timing factors.

- Our policy is to follow equivalent prudence and care in crypto asset investment in relation to rules and regulations associated with traditional securities investing, or otherwise as instructed by regulatory bodies. As a result, crypto asset investment strategies are developed after a client suitability review, like all other advisory services.
 - Changes in a portfolio are driven by rules to optimally weight client risk tolerance and investment objectives. Crypto asset exposure is only suitable for certain investors in higher risk tolerance tiers, or as determined suitable by the CCO. This is considered during initial consultation and on an ongoing basis through account reviews in pursuit of optimal client investment mix.
 - We abide by the same fiduciary standard and code of ethics for clients investing in cryptocurrency assets as it does in all other traditional securities.
- Material risks involved:
 - Crypto asset investing carries both significant and unusual risk versus traditional securities. The crypto market operates 24/7 and is more volatile in relation to other types of securities and asset classes. Valuation metrics are undeveloped making asset fair value evaluation highly challenging due to the lack of cash flow and earnings forecasts. Crypto assets have a greater chance of fraud, theft, and cybercrime. Crypto is a nascent industry and fundamentals are misunderstood by the investing public and many finance professionals.
 - Customer service levels for crypto exchanges and crypto custodians is inferior when compared to established broker-dealers with custody such as Charles Schwab.
 - Markets in crypto are also often less liquid versus other asset classes such as stocks or bonds. This is particularly true for obscure coins. If our firm begins advising and effecting transactions in the future for crypto assets, the unique nature of these risks will necessitate us to educate investors and provide market updates, which will be accompanied by appropriate risk disclosures.
 - A digital wallet is utilized for crypto transactions. Crypto assets are not protected by the FDIC or SIPC. Large exchanges often have digital asset insurance, in addition to having capital reserve requirements. Custody and verifiable proper storage of crypto assets is made possible through the exchanges acting with custody.
 - There are greater uncertainties and added layers of risk with respect to crypto industry asset custody and security. In the event of an account breach, exchanges often temporarily suspend withdrawals until a thorough security review is complete. This also creates liquidity risk for investors should a breach occur. Investors seeking maximum security of their crypto assets may have to make a trade-off by considering a cold storage method versus hot storage, or a hybrid between the two.
- **Consulting:**
 - Method of analysis and strategy
 - Consultations will evaluate opportunity vs. risk recommendations related to economic conditions, sales, income, and cash flow modeling over a predetermined period for specific investments. Consulting on potential investments such as real estate rentals or individual securities is a service

provided on a per hour basis. We do not manage physical assets acquired by clients.

- Material risks involved:

- There is no risk of capital losses in our Asset Management Consulting services as it is a billable hourly service charge. However, the firm acknowledges its investment advice could potentially lead to an investment which may result in the loss of value.

Item 9 -Disciplinary Information

The firm and its representatives are required to disclose all material facts regarding events deemed material to the evaluation of the integrity of the team of individuals managing assets.

The firm and its representatives do not have any information to provide to clients or prospects as it relates to the following:

- Disciplinary action from the SEC or any other federal or state regulatory agency.
- Criminal or civil action in a domestic, foreign or military court of competent jurisdiction.
- An administrative proceeding before the SEC, any other federal or state regulatory agency, or any foreign financial regulatory authority.
- A self-regulatory organization proceeding.

Item 10- Other Financial Industry Activities and Affiliations

Firm representatives are not registered with any broker-dealer.

The firm and its representatives do not select other investment advisers for clients.

The firm and its representatives do not have insurance affiliations.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

The Firm will provide a copy of its code of ethics to any client or prospective client upon request.

The goal of our code of ethics is to allow all persons to engage in personal securities transactions while protecting advisory clients, the Firm, and its employees or affiliates from conflicts in relation to violation of federal securities laws or from conflicts of interest. The code of ethics sets forth standards of conduct and requires compliance with federal securities laws. It also addresses personal securities trading of all representatives requiring the reporting of personal securities holdings and transactions, including those in affiliated mutual funds.

From time to time, a Firm representative may recommend a security, or other type of investment recommendation which the individual or related person has a material financial interest. As this is a potential conflict of interest, all representatives are encouraged to be transparent with clients and are required to provide personal securities holding information verbally or in writing to a client who requests this information.

All representatives except the CCO require verbal or written pre-approval from the CCO when investing personal capital in securities that are of material financial interest when the securities are currently held by a client or when timing for a client investment is planned in conjunction with a personal investment.

Item 12 - Brokerage Practices

The firm seeks to use a custodian/broker that will hold client assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. Our custodial agreements with Schwab meet our requirements where we consider a wide range of factors, including: Combination of transaction execution services and asset custody services (generally without a separate fee for custody), Capability to execute, clear, and settle trades (buy and sell securities for a client account), Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.), Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.), Availability of investment research and tools that assist us in making investment decisions, Quality of services, Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices, Reputation, financial strength, security and stability, Prior service to us on a personal level.

Broker-dealer and custodial agreements are requested to be executed through Charles Schwab. We do not routinely recommend, request, or require that a client directs the firm to execute transactions through a specified broker-dealer. However, we will allow clients to direct brokerage which must go through an approval process with our CCO. Directing brokerage may achieve less favorable execution, transaction price, higher fees, or expenses versus the established Schwab relationship. For example, a different broker-dealer might charge a commission on a trade that Schwab would not charge for.

We do not solicit or request other broker-dealers or custodians outside of Schwab.

There is no economic relationship Charles Schwab has with our firm. There is no direct compensation due to client transaction activity as client trading or holding related expenses such as commissions or fees are paid directly to Charles Schwab, a fund, or elsewhere as disclosed to the client.

For client accounts that Schwab maintains, Schwab generally does not charge clients separately for custody services but is compensated by charging commissions or other fees on trades that it executes or that settle into a Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in a client account in Schwab's Cash Features Program. For some accounts, Schwab may charge a percentage of the dollar amount of assets in the account in lieu of commissions.

We have determined that having Schwab execute most trades is consistent with a duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do have to request them) and at no charge.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by clients. Schwab's services described in this paragraph generally benefit a client and their account.

Schwab also makes available to our firm other products and services that benefits us directly but might not directly benefit clients. These products and services assist us in managing and administering clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that: Provide access to client account data (such as duplicate trade confirmations and account statements), Facilitate trade execution and allocate aggregated trade orders for multiple client accounts, Provide pricing and other market data, Facilitate payment of our fees from our clients' accounts, Assist with back-office functions, recordkeeping, and client reporting

Schwab also offers other services intended to help us manage and further develop our business. These services include: Educational conferences and events, consulting on technology, compliance, legal, and business needs, Publications and conferences on practice management and business succession, Access to employee benefits providers, human capital consultants, and insurance providers, Marketing consulting and support Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of personnel.

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to require that clients maintain an account with Schwab, based on our interest in receiving Schwab's services that benefit the business and Schwab's payment for services for which we would otherwise have to pay rather than based on client interest in receiving the best value in custody services and the most favorable execution of client transactions. This is a potential conflict of interest. We believe selection of Schwab as custodian and broker is in the best interests of clients. The selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

Clients give us authority to trade securities and assets with broker-dealers with custody once a Traditional Asset Management agreement is signed in full by the client and the investment advisor representative.

Research and Other Soft Dollar Benefits: We do not receive research or other products or services from broker-dealers because of client activity. We do not use soft dollar benefits to pay for a specific service level within accounts.

Brokerage for Client Referrals: We do not receive client referrals due to a client relationship with a broker-dealer. We do not consider this as material in requiring a broker-dealer relationship.

The Firm primarily invests in liquid securities and investments for its clients making the influence of underlying prices low. Block orders are allocated among clients when consolidated order opportunities are presented to us by several different accounts. Conditions for this may be related to an attempt to take advantage of lower commissions or to obtain a favorable price. The costs of not aggregating these securities transactions could be material. All account allocations are predicated on fair client price execution in terms of participation in the trade and value allocation across various client accounts. Liquidity issues could occur, and broker execution could be limited, thus leading to orders filled over multiple days at various prices. Average prices are determined once all orders are filled. We will equitably finalize and allocate orders in alignment with broker-dealer ability and client advisory agreements.

Item 13 - Review of Accounts

The firm periodically reviews client accounts and financial plans in Traditional Asset Management services. Anthony J. Deem, President and CCO, conducts general internal reviews at least quarterly for each account. The Firm is required to review and document suitability and recommendations no less than one time in a three (3) year period or more frequently if the client has specific needs or circumstances that warrant such a review. More frequent review may be triggered by inflows and outflows of capital, client requests, a change in market or economic conditions, rebalancing need, or following routine client risk assessments and objective reviews. Clients receive written account statements from custodians no less than once every quarter. Statements include account activities and balances during the period.

Item 14 - Client Referrals and Other Compensation

The firm does not have economic benefits arrangements that generate income.

The firm actively seeks third party solicitor arrangements in Ohio that generate income. The firm does not seek these agreements in Maine. The firm will have these agreements in place with entities and individuals that provide client referrals in exchange for a fee. This is potentially a conflict of interest. Before any fees are paid to a solicitor in exchange for a referral, they will enter into an agreement requiring delivery of a disclosure to the prospective client which details the arrangement. Solicitors must be in full compliance with all mandates required by the State of Ohio and to be in good standing as a Solicitor as outlined in Ohio Revised Code.

The firm receives an economic benefit from Charles Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain amount. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Item 15 - Custody

Charles Schwab maintains actual custody of client assets. Clients will receive account statements directly from Schwab at least quarterly.

The firm is authorized to debit advisory fees directly from client accounts in accordance with client advisory agreements and in compliance with applicable custody rules and regulations. By statute, the firm has a form of custody given this ability to deduct advisory fees from client accounts as instructed to the custodian to remit payment. Otherwise, the firm does not have direct custody of client funds, securities, or any other assets.

Account statements are sent at least quarterly from Charles Schwab to the postal mailing address or email. Statements include all transactional activity, inflows, outflows, non-advisory fees and expenses, and advisory fee deductions. Clients should carefully review these statements and compare Schwab with the Firm's portfolio reporting. Additional information related to account activity or supplemental information may be reported to clients directly from our firm. Clients are encouraged to contact Anthony J. Deem (CCO) at (330) 685-1975 or a@deemasset.com with any discrepancies.

Item 16 - Investment Discretion

The firm manages all securities and asset portfolios with limited discretionary authority which means without obtaining prior approval clients authorize us to buy or sell securities in their accounts, select

specific amounts, and recommend and select a broker-dealer with custody for accounts. Clients are responsible for all tax consequences related to buying or selling securities in the account related to rebalancing or other allocation activities. The firm will work with a tax professional to assist in financial and tax planning.

All transactions are subject to client investment objectives, goals, restrictions, or client specific needs to tailor firm activities around. Clients may restrict certain activities upon request should they desire a lower level of account discretion.

Limited discretionary authority is granted only when clients have received all related disclosure and authorize the activity with the firm in their advisory agreement or advisory profile document. Restrictions for discretionary portfolio management authority will be detailed in the advisory profile document which includes advisor and client signed acknowledgments.

Item 17 - Voting Client Securities

The firm does not vote client securities, nor does it plan to accept such authority from its clients.

The firm does not advise how to vote a proxy for securities.

Consistent with client advisory agreement language, the firm takes zero action with respect to proxy voting or solicitation. Transfer agents, broker-dealer / custodian are the parties which will provide clients with proxy vote information and solicitation on client securities.

Item 18 - Financial Information

The firm does not solicit prepayment of more than \$500 in fees per client six months or more in advance. As a result, a balance sheet is not included with the disclosure. Traditional Asset Management clients do not pay any fees in advance. Consulting clients may pay an advance fee for associated project work but can pay us no more than \$500.

As the firm meets the statutory definition of custody given its ability to deduct advisory fees from client accounts, it is required to report any financial conditions of the advisory and its representatives that could impair the ability to meet contractual commitments to clients. The firm will update the brochure in the future should such financial concerns arise with a firm representative. Currently, there are no material negative financial conditions to disclose on any representative.

Neither the firm nor its representatives have been subject of a bankruptcy petition.

Item 19 - Requirements for State-Registered Advisers

The Principal executive officers and management persons of the Firm are as follows:

Name & Title:	Anthony J. Deem, President & CCO
Date of Birth:	December 29, 1983
Education:	B.A. Finance, Walsh University, North Canton, Ohio, Class of 2006
Business Experience:	2006-2011, Market Research Associate, Cleveland Research Company 2011-2017, Associate Analyst, KeyBanc Capital Markets 2017-2019, Vice President, Senior Equity Research Analyst, Longbow Research 2020-2021, Senior Analyst, Investor Relations, Diebold Nixdorf 2015-Present, Sole Member and Manager of A2 Properties, LLC

2020-Present, President & CCO of Deem Asset Management, LLC
2025 – Present, Principal of mcp.ninja LLC and Precision Studio LLC

Mr. Deem has other general business activities that are not investment-related.

He is the only member of A2 Properties, LLC. It is an active workload averaging 10% or less of his available time to work on a weekly basis. The workload involves a portfolio of residential rental properties and lease agreements. Mr. Deem runs the day-to-day operations of the business such as finance, tenant relations, and property maintenance.

Mr. Deem became a minority member of Precision Studio LLC and mcp.ninja LLC in March 2025. The combined workload averages less than 10% of his available time on a weekly basis. Mr. Deem provides operational support, but he does not receive direct compensation for his involvement, nor is he an employee. These entities are not investment related, nor do they solicit or interact with Deem Asset Management's clients. mcp.ninja operates in Model Context Protocol server development. Precision Studio provides enterprise software development support across web applications, mobile development, desktop software and AI-driven data pipelines. Specific to Deem Asset Management, equity research productivity tools are being tested internally with future technical support expected to be provided by mcp.ninja and Precision Studio. The firm has assessed potential conflicts and determined that no material conflicts currently exist. Should any future technological developments result in direct client-facing investment tools or advisory services, the firm will reassess potential conflicts and update disclosures accordingly.

Neither the firm nor its representatives have been subject to proceedings with administrative or self-regulatory organizations. There are also no arbitration claims to disclose.

There is no significant relationship with security issuers that would cause a conflict of interest for clients.

No member or representative of the firm has a relationship or arrangement with an issuer of securities.

Item 1 – Cover Page

Deem Asset Management, LLC
Firm CRD # 315845
Anthony J. Deem, President & Chief Compliance Officer

Form ADV Part 2B: Brochure Supplement

2492 Country Club Dr.
Uniontown, Ohio 44685

Phone: (330) 685-1975
<https://deemasset.com/>

Effective: April 30, 2025

This brochure supplement provides information about Anthony J. Deem that supplements the Deem Asset Management, LLC brochure. You should have received a copy of that brochure. Please contact Anthony Deem at (330) 685-1975 if you did not receive Deem Asset Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony J. Deem is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Principal executive officers and management persons:

Name & Title: Anthony J. Deem, President & CCO

Date of Birth: December 29, 1983

Education: B.A. Finance, Walsh University, North Canton, Ohio, Class of 2006

Business Experience: 2006-2011, Market Research Associate, Cleveland Research Company
2011-2017, Associate Analyst, KeyBanc Capital Markets
2017-2019, Vice President, Senior Equity Research Analyst, Longbow Research
2020-2021, Senior Analyst, Investor Relations, Diebold Nixdorf
2015-Present, Sole Member and Manager of A2 Properties, LLC
2020-Present, President & CCO of Deem Asset Management, LLC
2025 – Present, Principal of mcp.ninja LLC and Precision Studio LLC

Item 3 - Disciplinary Information

There is no applicable information on Anthony J. Deem that are material to a client's or prospective client's evaluation of his integrity as it relates to: a) disciplinary events; b) criminal or civil actions; c) administrative proceedings; d) self-regulatory organization proceedings; e) any other proceedings.

Item 4 - Other Business Activities

Mr. Deem has no other investment related activities for compensation.

Mr. Deem has other general business activities that are not investment related. He is the only member of A2 Properties, LLC. It is an active workload averaging less than 10% of his available time to work on a weekly basis. The workload involves a portfolio of residential rental properties and lease agreements. Mr. Deem runs the day-to-day operations of the business such as finance, tenant relations, and property maintenance.

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Neither the firm nor its representatives have been subject to proceedings with administrative or self-regulatory organizations. There are also no arbitration claims to disclose.

There is no significant relationship with security issuers that would cause a conflict of interest for clients.

No member or representative of the firm has a relationship or arrangement with an issuer of securities.

Item 5 - Additional Compensation

Mr. Deem does not receive an economic benefit or additional compensation from anyone who is not a client of our investment advisory services.

Mr. Deem actively seeks third party solicitor arrangements in Ohio that may generate income. The firm does not seek these arrangements in Maine. Agreements will be in place with entities or individuals that provide client referrals in exchange for a fee. This is potentially a conflict of interest. Before any fees are paid to a solicitor in exchange for a referral, they will enter into an agreement requiring delivery of a disclosure to the prospective client which details the arrangement. Solicitors must be in full compliance with all mandates required by the State of Ohio and to be in good standing as a Solicitor as outlined in Ohio Revised Code.

Item 6 – Supervision

Mr. Deem is self-supervised at the firm within internal operations given his additional role and responsibility as the Chief Compliance Officer (CCO). Mr. Deem has implemented compliance procedures designed to ascertain suitability for specific investment advice given to individual clients. Mr. Deem is required to comply with the firm's compliance policy and procedures and its code of ethics.

Name, Title and Telephone Number: Anthony J. Deem, President & Chief Compliance Officer, (330) 685-1975.

Item 7 - Requirements for State-Registered Advisers

There are no material facts to provide on Mr. Deem as it relates to being involved in a bankruptcy petition.

There are no material facts to provide on Mr. Deem for disciplinary events, being found liable in arbitration claims, civil proceedings, self-regulatory organization proceedings, or administrative proceedings.