

CAP Partners, LLC is an investment adviser registered with the Securities and Exchange Commission. Investment advisers and broker-dealers offer different services under differing compensation models and it is important for retail investors like you to understand these differences. Educational materials about broker-dealers, investment advisers, and investing in general are available, along with free and simple tools to research firms and financial professionals, at <https://www.investor.gov/CRS>.

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

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We offer personalized investment advisory services to retail investors like you. We start by analyzing your financial profile and risk tolerance before working with you to design a strategy aimed toward achieving your investment goals.

**Principal Services.** The principal investment advisory services we offer to retail clients are financial planning services, asset management services, and financial counseling services uniquely tailored to address any unique needs or challenges you face.

**Financial Planning and Counseling.** Financial planning and counseling can take a number of forms, but generally involve helping you set long-term financial goals and recommending actions designed to help you achieve them. Our counseling and financial planning services generally include ongoing monitoring and updating of advice and recommendations.

**Asset Management.** Our asset management services generally include managing your portfolio based on your individual client profile using discretionary authority granted in our client agreement and supervising your investment accounts throughout the course of our relationship.

Additional information about the services we offer can be found under **Item 4** of our Form ADV Part 2A Brochure.

**Monitoring:** Unless your agreement with us specifically states otherwise, our investment advisory services generally include ongoing monitoring of client accounts by your investment adviser representative.

Additional information regarding our monitoring of client accounts can be found throughout our Form ADV Part 2A Brochure, particularly under **Item 13**.

**Discretionary Authority:** We limit our asset management services to discretionary relationships. Granting us discretionary authority allows us to determine which investments to buy and sell in your

account as well as the timing of transactions without asking you or obtaining your permission in advance.

Additional information on discretionary authority can be found under **Item 16** of our Form ADV Part 2A Brochure.

**Account Minimums and Other Requirements:** We offer a variety of investment programs to help us meet the unique investment profiles of each of our clients. We do not require a minimum account size to establish a relationship with us but could be a minimum fee for our Financial Planning Services.

Additional information about applicable minimum account size requirements can be found under **Item 7** of our Form ADV Part 2A Brochure.

**Conversation Starter**

- *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?*

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**What fees will I pay?**

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**Principal Fees and Costs.** Our fee for asset management services is generally based on the value of your investment account under our management and billed quarterly. This fee incorporates the active management and monitoring of your account and applies even if there are no transactions in your account during the billing period. Because our asset management services fee is based on the amount of assets under our management, we have an incentive to recommend that you place additional assets under our management.

We offer financial planning and counseling services under hourly rate or fixed fee arrangements. All of our

fees are generally negotiable and will vary based on the expected complexity of strategies to be pursued.

**Other Fees and Costs.** In addition to the fee you pay us for the services we provide, you may be responsible for other fees and costs incurred in connection with the management of your account or when implementing transactions recommended by us under a financial planning or counseling relationship. These costs, such as, for example, transaction costs and brokerage or custodial fees, are charged by third parties unaffiliated with us.

Certain investment products, such as mutual funds and exchange-traded funds, also charge ongoing fees to cover their internal operating costs (including portfolio management fees, legal and accounting services, and marketing expenses). 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 additional information about our fees and other costs of investing, please review **Item 5** of our Form ADV Part 2A Brochure.

#### Conversation Starter

*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.

For example, our investment adviser representatives are also licensed insurance salespersons. When such a representative prepares a financial plan for you, he or

she has an incentive to recommend that you purchase commission-paying products and then separately offer to help implement your plan by serving in the separate capacity of an insurance salesperson (and not as a representative of ours).

Although this conflict exists, we attempt to mitigate its effect by notifying you of it, confirming that you are under no expectation or obligation to implement any such plan through your representative in his or her separate capacity as an insurance salesperson.

For additional information about conflicts of interest between you and us, please review our Form ADV Part 2A Brochure generally, and particularly **Items 8, 10, 11, 12, 14, 15 and 18.**

#### Conversation Starter

*How might your conflicts of interest affect me, and how will you address them?*

#### How do your financial professionals make money?

Our advisors receive a portion of the advisory fee you pay to us for providing services to you. Although your advisor may not place his or her interests ahead of yours, our compensation structure, while standard in the industry, creates an incentive for your advisor to recommend that you engage him or her to provide additional services or to increase the amount of assets under his or her care.

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

No. A free and simple search tool is available to help research financial professionals, including us, at [www.investor.gov/CRS](http://www.investor.gov/CRS).

#### Conversation Starters

- *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?*

Additional information about us and the services we provide, including a current version of this Form CRS and our Form ADV Part 2A Brochure, is available for free online by searching our firm's name or CRD number (144779) at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or by contacting us at:

