

Spectrum Capital Investment Group, Inc. is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ. It is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at <a href="https://www.Investor.gov/CRS">www.Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.

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

We offer investment advisory services, including discretionary and non-discretionary investment management and financial planning services to individuals, businesses, pensions, trusts, estates and/or charitable organizations (our "retail investors").

When a retail investor engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our authority over your account(s) shall continue until our engagement is terminated.

We offer investment management and financial planning and consulting services as part of our standard Wealth Management agreement. When we provide these services, we rely upon the information provided by the client for our financial analysis and do not verify any such information while providing this service.

For more detailed information about our Advisory Business and the Types of Clients we generally service, please see Items 4 and 7, respectively in our ADV Part 2A.

Below are some questions you as a retail investor may wish to ask us about our relationship and services with you:

- "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?

When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under management. These fees are paid quarterly. Both investment advisory fees and minimum account opening balances are negotiable, but the advisory fee generally ranges between 0.50% to 2.00% based upon the amount of assets under management.

To the extent you request stand-alone financial planning and/or consulting services, we offer those on either a fixed fee basis, starting at \$2,000 for the first-year annual fee, or on an hourly rate basis of from \$175 up to \$375 per hour.

When engaged to perform due diligence on private placement investments, we shall charge a fixed fee according to a tiered schedule detailed under Item 5 in our ADV Part 2A. The fixed fee amount is based upon the initial investment amount.

Furthermore, your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions which is separate from our advisory fee. In addition, relative to all mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund 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.

# FORM ADV PART 3 (FORM CRS) JUNE 2020



For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our ADV Part 2A.

You may wish to 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?

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. As an example, we have a conflict of interest regarding advice given on adding new assets or transferring assets into accounts managed by our firm in that we receive compensation for your assets managed by our company. Our only source of revenue is from the investment management fees paid by our clients. Our firm does not make money from any other fees or revenue streams. We do not sell proprietary products, receive third-party payments, participate in revenue sharing or buy or sell investments from our company or company principal accounts directly to you. We therefore have no financial incentive to sell you any particular mutual fund or exchange-traded fund. We do have a financial incentive to increase your assets under management.

You may wish to ask us: "How might your conflicts of interest affect me, and how will you address them?"

For more detailed information about our conflicts of interest, please review our ADV Part 2A Item 10.

### How do your financial professionals make money?

Our financial professionals who are employees of the firm are compensated through a combination of salary and bonus. Bonuses are discretionary, and reflect the overall success of the firm and the individual. Our financial professionals who are independent contractors are paid a portion of the advisory fees collected from clients. Owners of the firm also benefit from the overall profits of the firm and may have an incentive to make recommendations to you that increase the firm's profitability.

Our financial professional also have the ability to receive commission when clients purchase insurance products, such as life insurance and/or long-term care. Such commissions are paid to your financial professional by insurance carriers, not by the client. We receive no additional incentives from insurance carriers or other intermediaries by recommending to clients one insurance carrier over another.

Additionally, affiliated company PUTMANGROUP offers tax planning, tax preparation, accounting, bookkeeping and business consultation services. In the capacity as employees of PUTMANGROUP, our financial professionals receive typical and ordinary compensation in return for performing the respective services associated with this affiliated firm.

You should discuss your financial professional's compensation directly with your financial professional. Please see Item 10 in our ADV Part 2A for additional details.

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

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals.

Furthermore, we encourage you to ask your financial professional: "As a financial professional, do you have any disciplinary history? If so, for what type of conduct?"

Additional information about our firm is available on the SEC's website at <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You may contact our Chief Compliance Officer at any time to request a current copy of your ADV Part 2A or our Relationship Summary. Our Chief Compliance Officer may be reached by phone: (949) 502-6700.

You, as a retail investor, may wish to ask a financial professional and start a conversation about the contacts and complaints:

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