



March 11, 2022

CHRISTY CAPITAL MANAGEMENT, INC.

FORM CRS RELATIONSHIP SUMMARY DISCLOSURE

Christy Capital Management Inc. ("CCM or we") is an investment advisor registered with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisors, and investing.

What investment services and advice can you provide me?

CCM financial planners meet with clients to gain an understanding of their financial picture, life circumstances and objectives. Based upon that information, CCM recommends certain third-party investment managers, who are not affiliated with CCM, to manage client assets. In all cases, the client enters into an investment advisory agreement with CCM. Depending on the third-party manager and investment program recommended by CCM, either CCM will hire the manager as a "subadvisor" or the client will hire the manager as a "co-advisor". In either case, CCM provides initial and ongoing investment advisor services to the client.

Where CCM recommends a manager and the client establishes a co-advisor relationship, the CCM's asset management services are provided on a non-discretionary basis. Non-discretionary means we are required to seek the client's consent *before* making any changes to investments. However, the third-party investment managers we recommend typically require that clients grant them the discretionary authority to make any changes to accounts without the client's prior consent. Where CCM engages a subadvisor, the client grants CCM and the manager discretionary authority over their accounts. CCM monitors the performance of the portfolios it recommends at least weekly and communicates with managers regarding concerns or suggested investment changes. CCM contacts clients at least annually to discuss their investments and financial situation.

There are no minimum investment amounts or conditions required for establishing an account managed by CCM. We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs. When providing you services, we do not recommend or offer advice on any proprietary products.

Additional Information about CCM and our financial advisors is available at [advisorinfo.sec.gov](https://www.advisorinfo.sec.gov). Please see Items 4 and 16 of our [Form ADV Part 2A Disclosure Brochure](#) for more detailed information about our services.

What fees will I pay?

Fees charged for our investment advisory services are based on a percentage of assets under management, billed monthly and calculated based on the fair market value of your account as of the last business day of the previous billing period. The annual fee for investment advisory services ranges up to 1.95%, inclusive of the third-party manager's fee. Because our fee is based upon the value of your account, we have an incentive to recommend that you increase the amount of assets in your account. You may also incur other fees and expenses charged by third parties. For example, the broker-dealer/custodian for your account may charge you fees for executing trades in your account, and the funds you invest in may

CONVERSATION STARTER QUESTIONS TO 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?

CONVERSATION STARTER QUESTIONS TO 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 cost?

charge management fees. Fees we charge for consulting services will not cover the costs associated with implementing any recommendations we may make. We will bill our consulting fees to you on a monthly basis.

For more details on the other fees and expenses you may incur, please see [Item 5 of our Form ADV Part 2A](#).

Additional Information: 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 the fees and costs you are paying.

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, 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.

Examples of Ways We Make Money and Conflicts of Interest:

- Retirement Accounts. We have a financial incentive to recommend that you roll over your employer-provided retirement plan account to an individual retirement account (IRA) which we manage because for a fee. This gives us an incentive to recommend a roll over.
- Insurance commissions. Some of our investment advisors hold an insurance license and may receive a commission for insurance or annuity products they recommend to you, which gives them an incentive to recommend those products.

Please see our [Form ADV 2A](#) for more detailed information about how we make money and our conflicts of interest.

CONVERSATION STARTER QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL

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

How do your financial professionals make money?

We compensate our investment advisors based on the level of assets they bring in to CCM. This compensation arrangement creates a conflict of interest by creating an incentive for the advisor to recommend that you invest more in your account with us due to the potential for increased payments. Some of our investment advisors hold an insurance license and may also receive a commission for insurance or annuity products they recommend to you, which gives them an incentive to recommend those products.

Please see our Form ADV Part 2A for more detailed information about how we make money and our conflicts of interest.

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

No, for our firm. Yes, for our financial professionals. Please visit investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

For more information about our services, please visit www.Christycapital.com or see our [Form ADV 2A Disclosure Brochure](#). For up-to-date information or to request a copy of this relationship summary, please call 1-866-331-7749 or email abby@christycapital.com.

CONVERSATION STARTER QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL

- As a financial professional, do you have any disciplinary history? For what type of conduct?

CONVERSATION STARTER QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL

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