

<p>Introduction</p>	<p>Spectrum Capital Management is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at <i>Investor.gov/CRS</i>, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<p>What investment services and advice can you provide me?</p>	<p>We offer investment advisory services (and do not offer brokerage) to retail investors, primarily in the form of discretionary portfolio management. Your account is established at a third-party custodian (such as Vanguard, or Schwab), and we are delegated, by you, the authority to manage the portfolio by selecting the investments within the account. Within the portfolio, we employ index-style mutual funds, and our focus is on diversification. We utilize mutual funds that embrace different asset classes (i.e., stocks, bonds, and cash). We further refine the diversification by using mutual funds that represent different segments of the major asset class categories.</p> <p>We monitor the portfolio at least monthly, and undertake transactions where needed to re-balance the portfolio’s diversification parameters or to implement changes in strategy. For additional information, please see our ADV – Part II.</p> <p>Conversation Starters: Ask your financial professional –</p> <ul style="list-style-type: none"> ➤ 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?
<p>What fees will I pay?</p>	<p>You will pay to us a fee based on the amount of money in the account. The fees vary with account size and in no case exceed 0.7% (seventy basis points) per annum. The fee for your account is described in our Investment Advisory Agreement, delivered to and signed by you. The more assets there are in the account, the more you will pay in fees, and the firm may therefore have an incentive to encourage the investor to increase the assets in the account.</p> <p>Our fee is billed quarterly, and the fee rate is applied to the average balance in the account over the prior three months. The mutual funds we use also have fees for operating expenses.</p> <p>You will pay these asset-based 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 costs and fees you are paying.</p> <p>Conversation Starter. Ask your financial professional –</p> <ul style="list-style-type: none"> ➤ 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? <p>For additional information, please see our ADV – Part II.</p>

<p>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?</p>	<p>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 affect the recommendations we provide you. Here are some examples to help you understand what this means:</p> <p>We can make more by encouraging you to add assets to your account. Other conflicts include proprietary products, third party payments, and revenue sharing. We have none of those.</p> <p>Conversation Starter: Ask your financial professional –</p> <ul style="list-style-type: none"> ➤ How might your conflicts of interest affect me, and how will you address them? <p>For additional information, please see our ADV – Part II.</p>
<p>How do your financial professionals make money?</p>	<p>Our financial professionals are compensated by salary only. No person receives commissions or any non-cash compensation. Salaries (and, if paid, bonuses) could increase as the firm’s revenues increase as result of acquiring additional assets under management.</p>
<p>Do your financial professionals have legal or disciplinary history?</p>	<p>No.</p> <p>Visit <i>Investor.gov</i> for a free and simple search tool to research us and our financial professionals.</p> <p>Conversation Starter: Ask your financial professional –</p> <ul style="list-style-type: none"> ➤ As a financial professional, do you have any disciplinary history? For what type of conduct?
<p>Additional Information</p>	<p>For additional information about our services ></p> <p>Visit our website at www.spectrumcap.net.</p> <p>Visit <i>Investor.gov</i> for a free and simple search tool to research us and our financial professionals.</p> <p>If you would like additional up-to-date information or a copy of this disclosure, please call Jeffrey Fulmer at (530) 888-9000.</p> <p>Conversation Starter: Ask your financial professional –</p> <ul style="list-style-type: none"> ➤ Who is my primary contact person? Is he or she aq 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?