

Item 1. Introduction

Wallace Capital Management, Inc. (“WCM”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Clients and prospective clients should be aware that services and fees differ between investment advisers and broker dealers, and it is important for retail investors to understand the differences. Free and simple tools are available to research advisory firms like us at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

Services: For our retail investors, WCM generally offers discretionary investment advisory services. Client assets are managed through separately managed accounts (“SMAs”) and private funds. WCM principally invests in stocks, bonds, notes, options and other securities and derivatives. WCM generally allows SMA clients to impose restrictions on our trading ability, but generally does not allow our private fund investors to impose restrictions beyond those already contained in the underlying fund documentation. WCM does not have a limited menu of investment types; rather WCM generally has broad authority to invest in a wide array of investment products. In cases where WCM does not have discretionary trading authority, clients are responsible for making their own trading decisions.

Monitoring: As part of our standard service, all of WCM’s accounts are reviewed, at a minimum, on a monthly basis to ensure they are following their investment strategy and any imposed limitations. WCM also conducts limited reviews when triggered by certain account or outside factors.

Requirements to open and maintain an account: All SMA clients execute an advisory agreement with WCM to open an account, and the minimum account size is \$2,000,000. WCM may elect to waive this minimum account size threshold at its discretion. Investments in private funds managed by WCM generally require a minimum investment of \$100,000, and the execution of the respective funds’ offering documents.

ADDITIONAL INFORMATION: Additional information can be found in our Form ADV, Part 2A, Items 4-7 available at: <https://adviserinfo.sec.gov/firm/summary/119174>.

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?*

Item 3. Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

Principal Fees and Costs: WCM is generally compensated for its investment advisory services provided to clients as a percentage of assets under management (charged quarterly) and, in some cases, incentive fees generated from investment returns that exceed certain hurdles (charged annually). The more assets you invest in your account, the more you will pay in fees, and therefore an incentive exists to encourage an increase in the size of your account either from gains in the value of your investments or contributions of additional capital. Fees paid to WCM for investment advisory services are separate and distinct from the fees and expenses charged to clients’ accounts and investments by other unaffiliated firms, such as brokerage, custodial, trading, account maintenance, and amounts that are included in the expense ratios of certain investments such as mutual funds, ETFs and alternative investments.

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 what fees and costs you are paying. For more information, please visit and see Items 4-6 in Form ADV, Part 2, available at <https://adviserinfo.sec.gov/firm/summary/119174>.

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?"*

Standard of Conduct/Conflicts of Interest

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 must 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, WCM may have an incentive to encourage you to increase the assets in your account because it is paid, in part, based on this amount.

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

ADDITIONAL INFORMATION: For more information on conflicts of interest, see Items 4, 9, 10 and 14 of our Form ADV, Part 2, available at <https://adviserinfo.sec.gov/firm/summary/119174>.

How do your financial professionals make money?

WCM personnel are compensated in the following ways: Cash compensation in the form of an annual salary, plus a discretionary bonus.

Item 4. Disciplinary History

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

WCM has not been subject to any disciplinary events by regulators nor is it a party to any legal events that are material to client evaluation of our advisory business. You can visit Investor.gov/CRS for free and simple search tool to research us and our financial professionals.

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

Item 5. Additional Information

If you have any questions about our investment advisory services or if you wish to request a copy of the relationship summary, please contact Blake Estess, Chief Compliance Officer, bestess@wallacecapital.com. Additional information about us is also available on the SEC's website at www.RIAinfo.sec.gov. You can also call us at 214-303-0200 for up-to-date information and request a copy of the relationship summary.

Conversation Starter – *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 his person is treating me?*