



Client Relationship Summary (Form CRS)

December 13, 2022

Dubeau Capital USA, Inc. (hereinafter referred as to “Dubeau Capital,” “we,” “us,” the Firm”, or “our Firm”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences.

Free and simple tools are available for investors to research firms and financial professionals at Investor.gov/CRS. Here, you can also find educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment management service to retail investors. In connection with those services, you should consider the application of the following:

We offer discretionary, continuous investment management service where the investment advice provided is tailored to meet their investment objectives, risk tolerance cash or income needs and any investment restrictions. We are not required to first consult with you before placing any specific order or obtain specific authorization from you for each specific transaction. Clients grant us discretionary authority by entering into agreement with us.

We provide advice with respect to stocks and bonds. Our advice is generally limited to these types of investments. Once an investment portfolio is constructed, we will provide ongoing monitoring and rebalancing of the portfolio as changes in market conditions and the client’s circumstance may require, at least monthly.

We generally require a minimum \$250,000 per household account balance for our investment management service.

For additional information, please see Form ADV, Part 2A brochure Items 4, 7, 13, 16 and other relevant items.

Conversation Starters. Ask your financial professional these questions to learn more:

- **Given my financial situation, should I choose a brokerage 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?

We charge an annualized fee based on the client’s assets under management (“AUM”), taken monthly in arrears and subject to the following schedule. These fees are negotiable.

Conversation Starter –

- **Help me understand how these fees and costs might affect my investments. If I give you \$250,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

The more assets there are in a retail investor’s advisory account, the more a retail investor will pay in fees, and the Firm may therefore have an incentive to encourage the retail investor to increase the assets in his or her account.

In addition to our advisory fees, you may pay transaction charges and/or brokerage fees to a broker-dealer or qualified custodian when purchasing or selling securities.

Fee Schedule	
AUM	Fee (in %)
First \$ 250,000	1.45
Next \$ 750,000	1.25
Next \$ 2,000,000	1.00
Next \$ 2,000,000	0.75
Next \$ 5,000,000	0.55
\$ +10,000,000	0.35

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, please see Form ADV, Part 2A brochure Item 5 and other relevant items.

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.

Here is an example to help you understand what this means:

Front-running. We and/or our supervised persons can invest in the same securities that are recommended to and/or purchased for you, and therefore we may have the incentive to trade ahead of you, as we have the advance knowledge of the trades we will place for you. To eliminate this conflict of interest, we will utilize block trades which means that we will trade at the same time and at the same price as our clients. In addition, we have adopted a compliance manual which establishes a number of restrictions, procedures and disclosures designed to address potential conflicts of interest.

For additional information, please see Form ADV, Part 2A brochure Items 11 and 12.

Conversation Starter –

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

How do your financial professionals make money?

Our professionals are compensated based upon a portion of the advisory fees paid to Dubeau Capital by their clients. Our professionals may also earn annual discretionary bonuses based on meeting certain criteria including client retention, client referrals, new client assets under management, total assets under management and general firm profitability. Certain Dubeau Capital professionals are additionally paid from Firm profits. Our Firm and financial professionals receive no product sales commissions.

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

Our representatives do not have any legal or disciplinary history in dealing with investors.

You can visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research our firm and financial professionals.

Conversation Starter –

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

For additional information about our investment advisory services, please review our Firm's Form ADV Part 2A Firm Brochure. If you would like additional up-to-date information or a copy of this disclosure, please write us at bonjour@dubeaucapitalusa.com. You may also call us at 418-628-5533.

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 this person is treating me?**