

Part 3 of Form ADV (Form CRS) – Relationship Summary

March 25, 2024

Introduction

Lunt Capital Management, Inc. is an investment advisor registered with the Securities and Exchange Commission.

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. We are an investment advisor and provide advisory accounts and services rather than brokerage accounts and services. Fees and services differ between brokerage accounts and investment advisory accounts. This document gives you a summary of the types of services we provide and how you pay.

Please ask us for more information. There are some suggested “Conversation Starters” throughout this document to help highlight important questions. There are also free and simple tools available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about investment advisors and investing.

What investment services and advice can you provide me?

We offer investment advisory services to help you with your investment accounts. We will offer you advice on a regular basis. As part of our standard services, we will discuss your investment goals, design a strategy to help achieve your investment goals, and regularly monitor your accounts on an ongoing basis. We will contact you as appropriate with communications about your portfolio and financial markets.

We offer advisory accounts for which we exercise discretion on your behalf. Under this arrangement, we buy and sell investments in your account without asking you in advance (a “discretionary account”). We may also give you advice and you decide what investments to buy and sell (a “non-discretionary account”).

Our investment advice will cover a large selection of investments and asset classes. We primarily use ETFs (exchange-traded funds) to build investment portfolios. We do not have a minimum account size requirement to open or maintain an account. *

Conversation Starters

- Given my financial situation, should I choose an investment advisory account? 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?

If you open an advisory account, you will pay an on-going asset-based fee at the end of each quarter for our services, based on the average daily value of the cash and investments in your advisory account. The amount paid to our firm generally does not vary based on the type of investments we select on your behalf.

The asset-based fee reduces the value of your account and will be deducted from your account. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account.

Some investments (such as exchange-traded funds and mutual funds) impose additional fees that will reduce the value of your investments over time. You may pay a transaction fee to a broker-dealer when we buy and sell an investment for you. You may also pay fees to a broker-dealer or bank that will hold your assets.

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. The more assets you have in the advisory account, including cash, the more you

will pay us. We therefore have an incentive to increase the assets in your account to increase our fees. Please make sure you understand what fees and costs you are paying. *

Conversation Starters

- 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 services will I receive for those fees?

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 at your investment advisor, 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 are some examples to help you understand what this means.

We have an incentive to advise you to invest in certain investments, such as ETFs for which Lunt Capital is the index provider, because the manager or sponsor of those investments shares with us revenue it earns on those investments. To address this conflict, we do not charge direct clients advisory fees on assets invested in ETFs which track Lunt Capital indices, including ETFs with tickers: ALTL, FCTR, PALC, and PAMC. We may charge advisory fees on these ETFs in accounts for which Lunt Capital acts as the third-party investment manager for other financial advisors.

We must abide by certain laws and regulations in our interactions with you. We are held to a fiduciary standard that covers our entire investment advisory relationship with you. *

Conversation Starters

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

How do your financial professionals make money?

We make money based on the assets we help manage for you. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account to increase our fees. You pay our fee quarterly, even if you do not buy or sell, or if your account(s) do not increase in value. *

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

No. We do not have legal or disciplinary events. Visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals. *

Conversation Starters

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

* Additional Information

For additional information about our investment advisory services and to request a copy of our *Relationship Summary* document, please see our Form ADV brochure on IAPD on Investor.gov or any brochure supplement your financial professional provides. Our Form ADV brochure can also be found at adviserinfo.sec.gov.

Please contact us by phone at (801) 503-3035 if you have a problem with your investments, investment account, a financial professional, to request up-to-date information, or to request a copy of our *Relationship Summary* document.

Conversation Starters

- 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?