

BONTEMPO OHLY CAPITAL MANAGEMENT, LLC

CLIENT RELATIONSHIP SUMMARY

Each section concludes with one or more sample questions for starting a conversation with a financial professional.

Introduction

Bontempo Ohly Capital Management, LLC is registered with the Securities and Exchange Commission as an investment advisor. *The Securities and Exchange Commission is a regulatory agency and does not endorse any registered investment advisor.* It is important to understand that brokerage services and fees differ from investment advisory services and fees. Free research tools and educational information about investing, investment advisors, firms, and broker-dealers are available at *Investor.gov/CRS*.

“What investment services and advice can you provide me?”

We provide investment advisory services – in particular, financial planning and discretionary-only account management. We do not provide brokerage services, nor do we accept sales commissions. We do not sell products such as life insurance, annuities, or other investments that typically pay commissions.

We monitor your investment portfolio on an ongoing and as-needed basis as part of our standard services. As a discretionary-only asset management firm, we make all buy and sell decisions on your behalf after agreeing upon an appropriate asset allocation (percentages in stocks and bonds). While we only use strategies consistent with our firm’s investment philosophy, we do offer advice and, when appropriate, referrals to help guide and give you access to other investment products that we feel are in your best interest to possess (e.g., long-term care insurance, etc.). Although we typically do not impose minimum account sizes, we will advise you as to whether it is in your best interest to open an account with us. *More detailed information on our services can be found in our ‘Firm Brochure,’ which we provide to all clients prior to entering into any agreement with us.*

- *“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?”*

“What fees will I pay?”

Our asset-based fees are assessed quarterly for our investment management services and are calculated as a percentage against the amount of assets that we manage for you. Consequently, while we have an incentive to encourage you to increase the assets in your account(s), we will not do so if we believe that such action is not in your best interest. Our financial planning services and other consulting services are charged by the hour or assessed a flat fee. All hourly and flat fees are agreed upon with you prior to engaging any of our services.

We use a wrap-fee arrangement to manage all of our clients’ accounts. Because wrap-fee programs include most transaction costs and fees paid to the broker-dealer (e.g., Schwab) that has custody of your assets, wrap fees are typically higher than asset-based advisory fees that do not include these charges. We use a wrap-fee arrangement to enable us to pay brokerage transaction charges on your behalf and to facilitate your total management fee calculations. Investments that have their own internal management fees such as an ETF (exchange-traded fund) do not materially benefit us but will add to your costs. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce

any amount of money that you make on your investments over time. Please make sure that you understand what fees and costs you are paying. *See our 'Investment Management Agreement,' 'Investment Management Program Brochure,' and 'Hourly Rate Schedule,' which we provide to all clients prior to entering into any agreement with us.*

- *“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 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 that we provide you. Here are some examples to help you to understand what this means. Because we are both the sponsor and money manager of our wrap-fee program, we will have an incentive to recommend our program. Additionally, because we will make more money by gathering more assets, we would benefit from recommending that you transfer additional assets to us. However, we will not make either recommendation if we believe that such action is not in your best interest. For more detailed information on conflicts of interest, please see our 'Investment Management Agreement' and 'Investment Management Program Brochure,' which we provide to all clients prior to entering into any agreement with us.

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

“How do your financial professionals make money?”

The financial professionals at our firm are compensated based on total revenues that the firm generates from its asset management, financial planning, and consulting fees (see the previous two sections for more information on how these payments can create conflicts of interest). No professional at our firm receives any cash or non-cash compensation that is derived from the amount of client assets he or she services, time or complexity to meet a client’s needs, product sales commissions, or client referrals.

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

No. You may visit *Investor.gov/CRS* for free and simple tools to research our firm and our financial professionals.

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

Additional Information

Additional and detailed information about our investment advisory services can be found in the initial packets that we deliver to all clients prior to entering into any agreement with us. In order to request up-to-date information and/or a copy of our ‘Client Relationship Summary,’ you may contact us at 240-497-1300.

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