

## Form CRS – Client Relationship Summary

March 31, 2022

### Introduction

NCM Capital Management, LLC (“NCM”) 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 the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

NCM provides personalized investment management and financial planning services. The firm provides financial advice to individuals, trusts, foundations, endowments, and corporations. NCM does not impose a minimum account size or require a minimum fee.


#### Asset Management

If you wish us to manage your investment accounts, we will begin by determining investment guidelines, so that we can determine the model portfolios which meet your needs. Some examples of guidelines include your risk tolerance, or a maximum amount of assets to be held in non-U.S. investments, or a limit on the amount of stocks in your portfolio. NCM can assist in developing these guidelines through the financial planning process described below. When we perform asset management services, we do so on a discretionary basis, meaning that while your advisor will communicate regularly with you, NCM will not seek specific approval of changes within your portfolio. If NCM is managing your assets, you may place reasonable restrictions on the types of investments in an account or portfolio. Because NCM takes discretion when managing accounts, clients engaging the firm will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) through an Investment Management Agreement that outlines the responsibilities of both the client and NCM. In limited circumstances, we may provide investment management services on a non-discretionary basis such that we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, in which case recommendations not implemented because we are unable to reach a non-discretionary client may not be made on a timely basis, and therefore the client's account may not perform as well as it would have had NCM been able to reach the client for a consultation on the recommendation. NCM allocates client assets among ETF's, Mutual Funds, Equities, Bonds and other securities necessary to meet client's investment objectives.


#### Financial Planning

NCM believes that thoughtful financial planning can be an effective tool for protecting and accumulating wealth. NCM can also assist in financial planning for special needs clients, including their businesses and wealth transfer issues. In most cases, the client will supply to NCM information including income, investments, savings, insurance, age and many other items that are helpful to the firm in assessing your financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you, and compare your current financial situation with the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals. The plan is intended to be a suggested blueprint of how to meet your goals.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients available by [clicking here](#).

 *“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?

All clients will be required to execute a written agreement that will describe the type of services to be provided and the fees, among other items.


#### Asset Management

Generally, fees vary from 0.3% to 1.5% per annum of the market value of a client's assets managed by NCM. The fee range stated is a guide. Fees are negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors. For clients whose assets are managed directly by the firm, investment advisory fees will be debited directly from each client's account. The advisory fee is paid quarterly, in arrears, and the value used for the fee calculation is the net value as of the last market day of the previous quarter.

### Financial Planning

Financial planning services may be offered on an hourly or fixed fee basis. Hourly rates are \$300 per hour. An estimate of total hours to complete the assignment will be determined at the start of the engagement. Generally, fifty percent (50%) of this estimate will be payable upon signing the Financial Planning Agreement. Fees or project balances for these services are due and payable upon delivery of the plan or advice. If the client elects to further engage the firm to provide Asset Management services, certain financial planning fees may be waived at the discretion of a principal of the firm during the initial engagement year. Services to be provided and the anticipated fee range are detailed in the written client service agreement. Fixed fees will be determined based upon the nature and complexity of the assignment. For example, a client with complex estate planning issues, multiple sources of investment income, and special needs heirs will have a more complex plan than a client with no estate planning issues, a single heir and a single source of income. Fees are negotiable, and will depend on the anticipated complexity of your plan.

Clients engaging NCM to provide both Asset Management and Financial Planning services simultaneously may receive discounted fees. There are several other fees that can be associated with holding and investing in securities. Clients are responsible for fees including transaction fees for the purchase or sale of a mutual fund and commissions for the purchase or sale of a stock or bond. Mutual fund expenses are not included in management fees because they are deducted from the value of the shares by the mutual fund manager. NCM does not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. 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 specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation available by [clicking here](#).

 ***“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 adviser?  
How else does your firm make money and what conflicts of interest do you have?**

**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 can affect the investment advice we provide you. As an example, since our fee is based on a percentage of assets in your advisory account(s), we have an incentive to increase the assets in your advisory account in order to increase our compensation.

Depending on a client’s given circumstances, we may recommend that a client rollover retirement plan assets to an Individual Retirement Account (IRA) managed by us. As a result of a rollover, we may earn fees on those accounts. This presents a conflict of interest, as we have a financial incentive to recommend that a client roll over retirement assets into an IRA we will manage. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code.

For more specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation available by [clicking here](#).


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

**How do your financial professionals make money?**

Financial professionals of NCM are paid a portion of the asset management/planning fees collected from clients. Financial professionals are not rewarded sales bonuses.


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


No. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS).

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

**Additional Information**

Additional information about our investment advisory services can be found at [www.ncmcapitalmgmt.com](http://www.ncmcapitalmgmt.com). A copy of our *relationship summary* can also be requested by calling (201)529-1429 or by [clicking here](#).

 ***“Who is my primary contact person? Is he or she a 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?”***



= Conversation starter. Consider asking your financial professional these questions.