

Item 1: Introduction

We are Premium 72 Capital, an investment adviser registered with the U.S. Securities and Exchange Commission (“SEC”). Investment advisory and brokerage services and fees differ – it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationship & Services

What investment services and advice can you provide me?

Premium 72 Capital offers investment advisory services to retail investors by financial professionals who are registered with us as Investment Advisory Representatives (“IARs”). If you open an advisory account, we will offer you advice regularly. We will provide you with a broad range of comprehensive financial planning, investment management, and consulting services. We will regularly monitor your account and contact you (by phone or e-mail) periodically to discuss your portfolio.

You can choose an account that allows us to buy and sell investments in your account without asking you in advance (a “discretionary account”) or you can choose to have us give you advice so that you decide what investments to buy and sell (a “non-discretionary account”). Our investment advice is typically implemented through exchange-traded equity securities, investment-grade corporate bonds, and US government/agency bonds. Other firms provide advice on a wider range of choices, some of which have lower costs.

We do not impose a minimum portfolio size or minimum annual fee.

Services, models, and strategies used by one IAR will be different than the strategies used by other IARs because Premium 72 Capital permits flexibility and does not require or mandate a particular investment strategy be implemented by its IARs, subject to Premium 72 Capital supervision and compliance requirements.

For additional information on Premium 72 Capital’s services, please see www.premium72.com or adviserinfo.sec.gov/firm/summary/284519 for our Firm Brochure (Form ADV 2A), Items 4 and 7.

Ask your financial professional:

- 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, & Standard of Conduct

What fees will I pay?

You will pay an on-going investment management fee on a monthly or quarterly basis for our services, based on the value of the cash and investments in your advisory account. We also charge hourly or fixed fees for financial planning and consulting services; some clients have negotiated to include these fees as part of the overall investment management fee. The amount paid to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. You pay our fee even if there are no securities transactions in your account. In addition to the advisory fees paid to Premium 72 Capital, you will also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions.

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. **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 about our fees and costs, services, please see premium72.com or adviserinfo.sec.gov/firm/summary/284519 for our Firm Brochure (Form ADV 2A), Items 5.

Ask your financial professional:

- 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 must act in your best interest and not place our interests 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 to you. Here are some examples to help you understand what this means:

- 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.
- Certain IARs of Premium 72 Capital offer financial planning for a fee. If we recommend that you implement the plan through other products or services offered by Premium 72 Capital, a conflict will exist due to Premium 72 Capital's receipt of the investment management fee or other relevant compensation. You are under no obligation to act upon the IAR's recommendations; further, if you do elect to act on any recommendation, you are under no obligation to effect the transactions through the IAR or Premium 72 Capital.
- As a firm, Premium 72 Capital has an incentive to recommend advisory accounts because we are not a broker-dealer. We have an affiliated broker-dealer named R.M. Stark & Co, Inc. At present, there are no IARs who are also affiliated with R.M. Stark, & Co., Inc. However, Premium 72 Capital has IARs who are registered with Cabot Lodge Securities, LLC ("CLS"), an SEC registered broker-dealer not affiliated with Premium 72 Capital. In a typical brokerage account with a broker-dealer, customers usually will pay a transaction-based fee, generally referred to as a commission, when the broker-dealer buys or sells an investment.

You can receive advice in either type of account, but you may prefer paying an asset-based fee if you want continuing advice, even though it usually will cost more than a transaction-based fee over longer periods. A transaction-based fee is more appropriate from a cost perspective if you wish to make alternative investments not offered by Premium 72 Capital or if you do not trade often, plan to make your own investment decisions, or you plan to buy and hold investments.

- If your IAR is an associated person of CLS, a conflict

of interest exists when your financial professional recommends that a security purchased at CLS be transferred to Premium 72 Capital because the asset increases the size of your account and generates increased fees for Premium 72 Capital and your IAR. We have procedures in place to ensure that any transfer recommendations are in your best interests.

For additional information about our conflicts of interest please see premium72.com or adviserinfo.sec.gov/firm/summary/284519 for our Firm Brochure (Form ADV 2A), Items 4, 5, 6, 10 & 11.

Ask your financial professional:

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

How do your financial professionals make money?

Our IARs make money by sharing in the investment management fee you pay to us based on the value of the cash and investments in your advisory account. They also share in any fixed fee you pay us for financial planning and consulting services. IARs with more assets under management with us generally receive a higher percentage share of the advisory fees you pay us.

Item 4: Disciplinary History

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

Yes. Please visit Investor.gov/CRS for a free and simple search tool to research Premium 72 Capital and our Investment Advisory Representatives.

Ask your financial professional:

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

Item 5: Additional information

You can find additional information about our advisory services, request up-to-date information, and request a copy of this relationship summary by:

- visiting premium72.com
- emailing compliance@premium72.com
- calling us at 910-720-7200

Ask your financial professional:

- 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?