

VLB Capital LLC
Form ADV Part 3 – CRS (Customer Relationship Summary)
April 19, 2023

Item 1: Introduction

VLB Capital LLC (“we” or “the Adviser”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser.

It is important for you to understand the difference in fees and services between brokerage firms and investment advisers. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me? We offer asset/portfolio management and financial advice to individuals, institutions, and corporations through discretionary and non-discretionary accounts pursuant to an Investment Advisory Agreement (“IAA”). When we manage your account on a non-discretionary basis, you will have the ultimate decision-making power over investments or recommendations provided for your account. The advice we provide is tailored to specific needs, goals, and objectives of each client. The investment management services that we will provide to you primarily consist of design and implementation of various personalized investment strategies for managed accounts. Investment activities focus on investments in various kinds of assets and securities in a variety of markets that are intended to fit within the client’s objectives, strategies, restrictions, time horizon and risk profile as described by each client. The CCO monitors and reviews client portfolios on a periodic basis, or as needed, due to market conditions or transactional activity. This includes the review of trade transactions to ensure such transactions have been executed properly and are correctly recorded into client accounts. Monitoring of your account is included as part of the standard services we provide to you. We do not offer advice only with respect to proprietary products, or a limited menu of products or types of investments. We require a minimum account size of \$100,000 to manage your account, although we reserve the right to waive it. *Please see **Form ADV Part 2A (Brochure) Items 4, 7, and 13** for more detailed information.*

Conversation Starters 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, Conflicts and Standard of Conduct

What fees will I pay? Fees for the management of accounts will be based upon a percentage of the total assets in the account. We typically receive an annual management fee, between 0.3% and 2%, based on the net asset value of the account, although all rates are negotiable. Clients of Discretionary and Non-Discretionary accounts are required to pre-authorize the Adviser or their custodian to directly debit management fees from their accounts on a quarterly basis, typically in arrears. Management fees are exclusive of charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. The Adviser can also charge performance-based fees in addition to standard advisory fees, as agreed to with certain applicable clients. Performance-based fees are calculated based on the performance of client portfolios and are only paid to the Adviser as a percentage of the gains if the account performs above a specified benchmark. **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 in order to increase our fees. 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.** *Please see **Form ADV Part 2A (Brochure) Item 5** for more detailed information.*

Conversation Starters 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?**

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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 affect the recommendations we provide you. Here are some examples to help you understand what this means: We and our related persons can buy or sell for ourselves securities that we also recommend to you. Such transactions can include trading in securities in a manner inconsistent with the advice given to you. Additionally, the Adviser's supervised persons can be involved in other activities which may influence the time spent on servicing advisory clients. Shared supervised persons are also entitled to additional compensation depending on their capacity and role with other outside business activities. Lastly, if your account is subject to performance-based fees based on your agreement with us, those fees can potentially incentivize us to make more speculative investments than would be the case in the absence of such performance fee arrangement. We render only disinterested and impartial advice to clients and our goal is to comply with fiduciary obligations. We are responsible for recommending investments based on your investment objectives and risk tolerance. ***Please see Form ADV Part 2A (Brochure) Items 10 and 11 for more detailed information.***

Conversation Starters Ask your financial professional

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

How do your financial professionals make money? Neither we nor any of our supervised persons (employees) accept compensation for the sale of securities or other investment products for advisory clients. Our financial professionals are solely compensated on a salary basis.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No, we do not, as noted on Form ADV Part 1, Item 11, Part 2A Item 9, or disclosures for any of our financial professionals in Items 14 A-M of their Form U4. Please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us or our financial professionals.

Conversation Starters Ask your financial professional

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

Item 5: Additional Information

To obtain more information, you may visit [Investor.gov](https://www.investor.gov) for a free and simple search tool to research our firm and our financial professionals. To report a problem to the SEC, visit [Investor.gov](https://www.investor.gov) or call the SEC's toll-free investor assistance line at (800) 732-0330.

For additional information on our investment advisory services, see our Form ADV on IAPD or [Investor.gov](https://www.investor.gov). Information regarding our firm can be found at adviserinfo.sec.gov. or by calling our firm at 305-850-4543 for up-to-date information or to request a copy of the relationship summary.

Conversation Starters 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?**