



## Form CRS (Part 3 of Form ADV) for Matson Capital, LLC

Matson Capital, LLC (Matson Capital) is registered with the SEC as an investment adviser. Investment advisory and brokerage services and fees differ, and it is important to understand the differences. For free and simple tools to research advisers, broker-dealers and financial professionals and educational materials, click [HERE](#).

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

We offer investment advisory services to retail investors. Our services provide a solution for clients of existing investment advisers currently working with Matson Money, Inc. (Matson Money) who are nearing the end of their business life cycles. We focus our investment advisory services solely on recommending investment programs designed and operated by Matson Money, a registered investment adviser affiliated with us. The Matson Money investment programs allocate a client's assets among various mutual funds managed by Matson Money (Matson Funds) or by third-party advisers. Clients typically will have been invested in a Matson Money investment program before becoming our clients. We generally will not agree to provide investment advice with respect to assets that are not invested in, or are not intended for investment in, a Matson Money investment program. We do not currently have a minimum account size requirement for a retail investor to open or maintain an account or establish a relationship.

At the beginning of the relationship, we will evaluate your financial circumstances, current investments, investment objectives, financial goals, risk tolerance and time horizon. We then will make a recommendation regarding a Matson Money investment program and related investment strategy and asset allocation. This recommendation could be to maintain your current Matson Money investment program, investment strategy and asset allocation, or we could recommend changes. You are not otherwise permitted to impose a restriction on your account.

As part of our standard services, we monitor the mix of investments utilized by Matson Money on an ongoing basis, and we will review your account at least annually. We can update our recommendations at any time. We will contact you (by phone or e-mail) at least annually to discuss any changes to your situation.

Our investment advisory services are non-discretionary, which means that we make investment recommendations and you make the ultimate decisions regarding purchases or sales of investments. While you will have no obligation to us to implement our recommendations, if you have granted discretionary authority to our affiliated adviser, Matson Money, Matson Money could ultimately make decisions regarding the purchase or sale of investments.

Additional information can be found in our Brochure, Items 4-5, 7, and 13, click [HERE](#).

**You can ask 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?

**Principal Fees and Costs.** We are paid an advisory fee based on the market value of the assets in a client's account. Our standard annual advisory fee rates are 0.99% for the first \$500,000 in a client account, 0.75% for the next \$500,000, 0.50% for the next \$3,000,000, and 0.25% for assets over \$4,000,000. The annual fees are negotiable and pro-rated and paid in advance on a quarterly basis, based on the quarter end value of the client's account, and deducted from the client's account by Matson Money. The more assets there are in a client's advisory account, the more the client will pay in fees, and we therefore have an incentive to encourage clients to increase the assets in their accounts.

**Other Fees and Costs.** When implementing our recommendations, a client will incur additional fees such as brokerage commissions, transaction fees and other related costs and expenses, custodial fees, sales charges, transfer taxes, wire transfer and electronic fund fees and other fees and taxes on brokerage accounts and securities transactions. Additionally, the Matson Funds and other mutual funds and exchange-traded funds that can comprise a Matson Money investment program charge management fees, which are disclosed in such funds' prospectuses. The more assets there are invested in Matson Funds, the greater the fees that our affiliate Matson Money collects, and we therefore have an incentive to recommend Matson Fund investments.

*Additional Information.* 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. Additional information can be found in our Brochure, Items 4-5, click [HERE](#).

**You can ask 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 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. Here are some examples to help you understand what this means.

We recommend investment programs in which our affiliate, Matson Money, will primarily allocate your assets among Matson Funds. The recommendation to invest in Matson Funds creates a conflict of interest because Matson Money receives advisory fees from the Matson Funds, and therefore our affiliate benefits to the extent that you invest in Matson Funds. Separate from the fees and expenses associated with the Matson Funds, we receive an annual fee from you based on the amount of assets in your account. The greater the client assets under our management, the more we will collect in fees. As a result, we have an incentive to encourage you to increase the assets maintained in your account with us. Additional information can be found in our Brochure, Items 4-5, click [HERE](#).

Additionally, in recommending Matson Money investment programs, we examine the experience, expertise, investment philosophies and past performance of Matson Money, and we also consider its compliance program, enterprise risks and reputation. There is a conflict of interest involved in such diligence and oversight, however, because certain key personnel responsible for our diligence and oversight of Matson Money also hold key roles within Matson Money and are involved in the elements of Matson Money's operations – such as portfolio management, compliance and operations – that we seek to monitor. This creates an incentive to be less fair, thorough or objective in such diligence and oversight than we might otherwise be with an unaffiliated third party. Additional information on these conflicts, and how we seek to address and mitigate them, can be found in our Brochure, Item 8, click [HERE](#).

**You can ask us:** *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

Matson Capital personnel receive salaries and, in Matson Capital's discretion, year-end bonuses. Year-end bonuses are generally based on Matson Capital's overall financial performance. A conflict of interest exists because Matson Capital personnel can receive a bonus based partially on Matson Capital's overall assets under management, giving personnel an incentive to encourage you to increase the assets maintained in your account with us. Additionally, certain personnel of Matson Money can receive a bonus based partially on Matson Money's overall assets under management, giving these persons an incentive to retain and add client assets. To the extent any such persons are shared personnel between Matson Money and Matson Capital and are involved with Matson Capital's investment recommendations, there would be a conflict of interest as such persons would have an incentive to recommend Matson Money investment programs.

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

No. For a free and simple search tool to research us and our financial professionals, click [HERE](#).

**You can ask us:** *As a financial professional, do you have any disciplinary history? For what type of conduct? 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?*

To obtain additional information about our services, a copy of this relationship summary or up-to-date information, please click [HERE](#) or contact us at 513-204-8084 or [info@matson.capital](mailto:info@matson.capital).