

Pivot Capital Partners LLC - Form CRS
April 4, 2025

Pivot Capital Partners LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, 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. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?

We offer the following investment advisory services to retail investors. These services include portfolio management, financial planning, financial consulting and pension consulting services.

- **Account Monitoring** - If you open an investment account with our firm, as part of our standard service we will monitor your investments on an ongoing basis and we will conduct account reviews at least quarterly.
- **Investment Authority** - We manage investment accounts on a discretionary basis whereby we will decide which investments to buy or sell for your account. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. We offer non-discretionary investment management services whereby we will provide advice, but you will ultimately decide which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.
- **Investment Offerings** - We offer advice on equity securities, warrants, corporate debt securities (other than commercial paper), commercial paper, certificates of deposit, municipal securities, variable life insurance, mutual fund shares, United States government securities, options contracts on securities and on commodities, futures contracts on tangibles and on intangibles, private placements, money market funds, real estate, REITs, derivatives, structured products, exchange-traded funds ("ETFs"), digital assets, interests in partnerships investing in real estate and in oil and gas interests. Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.
- **Account Minimums and Requirements** - We require a minimum account size of \$10,000,000 to open and maintain an advisory account, which may be waived at our discretion.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 by clicking this link <https://adviserinfo.sec.gov/firm/summary/335324>.

Key Questions to 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?**

What fees will I pay?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

- **Asset Based Fees** - Our asset-based fees for portfolio management services is based on a percentage of the assets in your account and is billed and payable, quarterly in advance, based on the balance at the end of the prior billing period. Our advisory fees range from 1.25% and 2.00% annually. Our advisory fee is negotiable, depending on individual client circumstances. This presents a conflict of interest as we are financially incentivized to encourage you to place more assets in your advisory account as you will pay more in advisory fees.
- **Hourly Fees** - Standalone financial planning and financial consulting services are billed and payable in advance. We charge an hourly fee of \$500 for financial planning and financial consulting services. Our fee is negotiable depending on the scope and complexity of the services rendered.
- **Fixed Fees** - In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we may offer a fixed fee between \$1,000 and \$10,000 depending upon the scope and complexity of the services rendered. In such cases, we will notify you and request that you approve the additional fee. The first half of the fixed fee is billed and payable advance of services rendered with the remaining balance payable upon completion of the contracted services.
- **Pension Consulting Fees** - Pension consulting fees will be negotiated with the plan sponsor or named fiduciary on a case-by-case basis.
- **Other Fees and Costs** - In addition to our advisory fee, you will also be responsible for third party manager

and/or platform fees, custody fees, account administrative and maintenance fees, fees and expenses related to mutual funds and exchange traded funds, applicable securities transaction fees, and other product-level fees associated with your 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.

For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link <https://adviserinfo.sec.gov/firm/summary/335324>.

Key Questions to 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 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 investments that are issued, sponsored, or managed by our firm or our affiliates. We have a financial incentive to recommend such proprietary investments.
- We are affiliated with RPJ Financial LLC and PTF Group, LLC through common control and ownership. Pivot Capital Partners LLC is separate and distinct from RPJ Financial LLC and PTF Group, LLC. Referral arrangements with an affiliated entity present a conflict of interest for us because we may have a direct or indirect financial incentive to recommend an affiliated firm's services.
- Persons providing advice on behalf of our firm are registered representatives with a broker-dealer. These persons receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- Because our revenue is derived from asset-based fees, we have an incentive to grow your account as much as possible. This could cause us to take overly aggressive positions in conflict with your interests in an attempt to grow your account, or could incentivize us to inflate the valuations of illiquid investments held in your account.

Key Questions to Ask Your Financial Professional

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

Refer to our Form ADV Part 2A Brochure by clicking this link <https://adviserinfo.sec.gov/firm/summary/335324> to help you understand what conflicts exist.

How do your financial professionals make money?

Our financial professionals are compensated by a bonus and based on a percentage of the revenue earned from assets under management. This means financial professionals have an incentive to increase the asset size in the relationship or solicit new business, which can limit the financial professionals' availability from time to time.

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

Yes, our firm or our financial professionals currently have legal or disciplinary history to disclose. These events are disclosed in either our Form ADV or the specific individual's Form U4. These documents can be found by going to [Investor.gov/CRS](https://investor.gov/CRS), a free and simple research tool.

Key Questions to Ask Your Financial Professional

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 888-585-9981 or click the link provided <https://adviserinfo.sec.gov/firm/summary/335324>.

Key Questions to 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?**