

## **Form ADV Part 3: Relationship Summary** **Christy Capital Management, Inc.**

### **Introduction**

Christy Capital Management, Inc. (“CCM” or “we”) is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professional at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

### **What Investment Services and Advice can You Provide me?**

**Description of Services:** We offer investment advisory services to retail investors. Our investment advisory services include: Asset Management Services and 529 Plan Consulting Services.

**Asset Management Services:** CCM provides asset management services through a sub-adviser, who we will evaluate, select, and monitor to manage and trade your account(s). CCM will discuss your investment goals and design a strategy to try and achieve your investment goals. CCM will continuously monitor your account when providing asset management services and contact you at least annually to discuss your portfolio. For more information please see **Item 4** of our **Form ADV Part 2A**. Asset management services are provided on a **non-discretionary** basis, meaning we will be required to contact you prior to implementing any trades in your account. For more information please see **Item 16** of our **Form ADV Part 2A**.

**529 Plan Consulting Services:** CCM offers ongoing advisement consultations for clients regarding 529 college savings plans. When providing these services, we review your financial situation, goals and objectives as well as the investment options available in the 529 plan.

**Limited Investment Offerings:** We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client’s specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer’s platform. When providing you services, we do not recommend or offer advice on any proprietary products.

**Account & Fee Minimums:** There are no minimum investment amounts or conditions required for establishing an account managed by CCM.

**Conversation Starters:** *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?**

**Description of Principal Fees & Costs:** Fees charged for our asset management services are charged based on a percentage of assets under management, billed in arrears on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the previous billing period. The annual fee for asset management services will range up to 1.95%. Because our fee is based upon the value of your account we have an incentive to recommend that you increase the level of assets in your account. For more information about the fees we will charge you please see **Item 5 of our Form ADV Part 2A**. When engaging us for asset management services you will also incur other fees and expenses. The broker-dealer/custodian on your account will charge you transaction fees for executing trades in your account. You may also be charged management fees by the funds we invest in, within your account. For more details on the other fees and expenses you may incur please see **Item 5 of our Form ADV Part 2A**.

Financial consulting services are provided under a percentage of the account values basis. The 529 Consulting Service fee will be 1.4% of the value to the assets held in the clients 529 accounts.

Any fees we charge for consulting services will not cover the costs associated with implementing any recommendations we may make. For more information please see **Item 5 of our Form ADV Part 2A**.

We will bill our consulting to you on a monthly basis.

**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.

**Conversation Starters:** *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?**

**Standard of Conduct:** 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: To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account (“IRA”) managed by us and subject to our asset-based investment advisory fees, this is a conflict of interest because we have a financial incentive to recommend that you move your IRA to us even if it is not in your best interest. For more information about this conflict and our procedures to mitigate the conflict, see **Item 4** of our **Form ADV Part 2A**. We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts. For more information see **Item 11** of **Form ADV Part 2A**. When we recommend that you utilize a third-party money manager we will receive a percentage of the fee which they collect from you. This creates a conflict of interest as we have an incentive to recommend managers who have such arrangements with us. We receive expense reimbursement for advertising and marketing expenses from distributors of investment and/or insurance products which is a conflict of interest because it creates an incentive to recommend products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. Some of our investment adviser representatives also serve as insurance agents. Through their role as such they may sell, for commissions, various insurance products. We have a conflict of interest in recommending these products to you because of the potential for additional revenue.

**Additional Information:** For more information about our conflicts of interests and the ways we are compensated please see **Item 5 and Item 10 of our Form ADV Part 2A**.

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

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

**Description of Salary/Payment of IARs:** We compensate our investment adviser representatives based on the level of assets that they bring in to CCM. This creates a conflict of interest as it gives your representative an incentive to recommend you invest more in your account with us due to the potential for increased payments.

Our investment adviser representatives also serve as licensed insurance agents. When acting in this capacity they will receive commissions for selling insurance products. This creates a conflict of interest when they recommend you purchase insurance products through them.

**Additional Information:** For more information about these conflicts of interest please see **Item 10 of our Form ADV Part 2A**.

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

The firm has no legal or disciplinary history to report however, some of our representatives have legal or disciplinary matters that has been previously publicly disclosed. Specific information can be found at <https://www.investor.gov/CRS>.

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

**Additional Information about Christy Capital Management, Inc.**

Additional information about us and a copy of this relationship summary are available on the Internet at [www.christycapital.com](http://www.christycapital.com). You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/149313>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at (478) 314 -2160.

**Conversation Starter:** *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?*