

INTRODUCTION

Brooktree Capital Management Inc. is an investment advisor and we are registered and regulated by the United States Securities and Exchange Commission.

Investment advisory services and fees are different from one company to another, and it is important that you understand the differences.

There are free and simple tools that are available to you so that you can research different investment advisor companies and different financial professionals. Simply go to the internet and type in the site Investor.gov/CRS to conduct your research.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

As an investment advisor, Brooktree Capital Management Inc. will oversee your money that is typically set aside for the long term and not for your day to day expenses. If you hire us as your investment advisor, we then perform all the analysis and review to determine what financial assets, such as stocks or bonds, we should buy or sell for you on your behalf.

Our services involve our team deciding what to buy or sell for you, so you do not have to do this work and analysis. We will continuously monitor your investments to determine whether any securities should be purchased or sold and we will supply you either with an application to monitor your investments over the internet and/or we will provide you with a monthly statement of your assets in either electronic or paper format. This is all part of the standard services we supply to all clients.

You will grant us authority to perform these services for you by signing a contract with us. This contract will give us discretionary authority, which means you have authorized us to buy or sell any security in the public markets we feel is appropriate for your circumstances. Typically, we are actively working to build a stock portfolio for you through our purchases on your behalf. The authority you grant to us through our contract may be revoked by either of us at any time with written notice and we will promptly refund to you any unearned fees that may have been charged to you.

Additional Information

We generally provide investment management services to individuals, trusts, pensions and profit-sharing plans, estates, charitable organizations, corporations and other business entities. While we manage most of our client's accounts based on similar investment strategies suitable for similar investment objectives, we take your personal financial circumstances into account in formulating our advice and investment decisions for your account. Based upon the information you provide, we will consider many factors such as your income and expenses, assets and other financial resources, financial or special needs, investment goals, anticipated investment time horizon, and other personal financial circumstances. If you have investments held in other accounts not under our management, we will take those investments into consideration if you tell us about them. In managing your account, we will take income tax planning into consideration if you provide us with your historical, current, and anticipated tax-related information. If you desire, we will coordinate our investment decision-making with your tax accountant or preparer. We rely upon you to keep us up to date about changes in your personal circumstances.

Given my financial situation, should I choose an investment advisory service? Why or why not?

We believe you should choose an investment advisory firm such as ours if you do not adequately have the time to devote to analyzing and deciding what to buy or sell or if you do not have the knowledge or interest in doing the work required to decide what to buy or sell.

How will you choose investments to purchase for me?

We base our decision making on fundamental analysis which means after we identify a great stock or company to purchase, we focus on the economic characteristics of the stock looking at such items as profit levels and ratios, debt levels, and competitive position in the market place. If this looks favorable to your interests, then we purchase and if it does not, we pass or sell the stock.

What is your relevant experience, including licenses, education and other qualifications?

Brooktree Capital Management Inc., is owned and operated by Brian Ellis and Hunter Lewis.

Mr. Ellis was born on March 6, 1960. Mr. Ellis graduated from the University of Notre Dame, South Bend, Indiana, in 1982 with a Bachelors of Business Administration in Accounting. He graduated from the University of Michigan, Ann Arbor, Michigan, in 1984, with a Masters of Business Administration (MBA) in Finance. Mr. Ellis has worked in the financial services industry since 1996.

Mr. Lewis was born on December 14, 1989. Mr. Lewis graduated from Grand Valley State University, in Grand Rapids, Michigan, with a Bachelors of Business Administration in Finance and Business Economics. In 2015, Mr. Lewis was awarded the right to use the Chartered Financial Analyst® or "CFA®" designation by the CFA Institute. Mr. Lewis has worked in the financial services industry since 2011.

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay?

You will be billed quarterly in advance based upon a percentage of the market value of your assets under our management. The first billing cycle begins on the account starting date and is based on the account value on the starting date. We prorate the fee for new accounts based on the number of days remaining in the calendar quarter. The quarterly billing value is equal to the closing market value of the account on the last business day of the quarter. Our generally applicable fee schedule for investment management services is:

0.85% per year up to \$1.0 million of assets under management
0.65% per year from \$1.0 to \$2.0 million under management
Fees for accounts valued over \$2 million will be negotiated

What other fees are there?

Brooktree Capital Management charges no other fees. TD Ameritrade Institutional (the custodian) does not charge a fee for your account maintenance nor is there a commission charge for purchasing or selling the most commonly used securities in your account like stocks and bonds. There may be a commission charge for less widely used securities such as options.

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.

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?

Based upon our fee schedule, you would pay .85% of the value of your account annually in fees. This means \$85 would be paid out to our firm and then we would invest the balance or \$9,915 on your behalf.

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, 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 we mean. Since we are paid by you based upon a percentage of the value of your account, we are incentivized to have more of your assets under our management. Additionally, we are incentivized to make good decisions on your behalf and if your account goes up in value we will ultimately earn more in fees.

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

We believe we are incentivized to grow your assets under our management and to make good investment decisions for you which will lead to us earning more fees. If you benefit, we benefit.

How do your financial professionals make money?

Both Brian Ellis and Hunter Lewis are both paid an annual salary plus a year-end bonus based upon the overall profitability of Brooktree Capital Management Inc. We do not earn any fees or compensation other than those that are billed to our clients for our services.

DISCIPLINARY HISTORY

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

NO. Please visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple research tool to research us and our investment professionals.

ADDITIONAL INFORMATION

Additional information about us can be found at our website brooktreecapital.com or requested from us in printed format.

You can request further information or a copy of this relationship summary by calling our main office number at 616-774-3159.

Who is my primary contact person? Who can I talk to if I have concerns about how this person is treating me?

Feel free to contact either Brian Ellis or Hunter Lewis at 616-774-3159 for any issues you may have.