

Conversation starters: Ask your financial professional:

Given My Individual Financial Situation, Should I Choose an Investment Advisory Service or a Brokerage Service? Under What Conditions should I Make These Choices?
How Will We Choose Investments to Recommend to You?
What is Our Relevant Experience, Including Licenses, Amount of Experience in This Industry, Education and Other Qualifications? What do These Qualifications Mean?

What Fees Will I Pay?

Investment Management Fees

QCM charges fees for its Investment Management Services that are described below:

- **Initial Fees** (Strategic Portfolio Design Fee) - to evaluate a client's current investment position and recommend suitable changes in portfolio mix and emphasis. This may be charged separately from ongoing fees for portfolio management. A negotiated initial fee is proposed based on an estimate of the time required to provide the appropriate level of service and the level of complexity anticipated in the relationship. Initial fees range from .5% to 1.5% of AUM.
- **Normal Hourly Rates** - upon which estimates are based, are approximately \$300 per hour.
- **Quarterly Fees for Portfolio Management** - are primarily based on a percentage of the value of the investments under management; however, such services may also be provided for a fixed retainer payable quarterly in advance.
 - **The Standard Fee** - is generally up to 50 basis points per quarter or two percent (2%) per year. This applies to all services including any sub-advisory fees. Total annual fees cannot exceed three percent (3%) of assets.
 - **QCM Charges Wrap Fee Program Clients** - a maximum of 2% annually (.50% quarterly). QCM evaluates annually whether a Wrap Fee is in best interest of the Client vs. a traditional commission-based account.
- Clients will also pay custodian fees, fees related to mutual funds and variable annuities and other custodial and clearing charges.

Exceptions to the established fee schedule may be negotiated on an individual basis based on certain criteria including relationship history, type of assets, potential account size, expected activities, volume of transactions or a requirement for more or fewer services.

In order to encourage interaction with our clients, there is no limit placed on the amount of professional time made available for portfolio related or general financial discussions. QCM may bill separately for additional services; particularly where research, further analysis, projections, tax preparation, etc. are required. One or more of the following billing methods may be recommended, depending on the services:

Brokerage Services Fees

Clients who prefer to pay transactional fees will be subject to our commission schedule summarized below.

- **Equities and Fixed Income:** Commissions for equity and fixed income transactions begin at \$75 per trade and will fluctuate depending on the number of shares/units transacted and the value of the underlying security.
- .
- **Mutual Fund Trail Retention Policy:** When a mutual fund is held in a retail commissionable account, QCC retains the administrative or 12b-1 fee that helps offset processing and general operating costs. For fee accounts that hold no-load mutual funds, QCC similarly will retain the administrative or 12b-1 fee. No-load mutual funds are classified as those without a front-end or back-end sales concession and with 12b-1 fee of 25 basis points or less.

- **Mutual Fund Trails and Direct Purchases:** All mutual fund orders, including trails and direct purchases, are exempt from minimum ticket requirements for clients.
- **Other Fees:** A \$5.95 handling/processing fee, which is not considered in payout calculations, will be charged on most transactions. Clients will also pay custodian fees, and clearing charges

Please refer to our commission schedule, available upon request, for more details.

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, also known as your rate of return. Please make sure you understand what fees and costs you are paying. For additional information, please see Form ADV, Part 2A brochure regarding QCM's fees.

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?

What Are Our Legal Obligations to You When Providing Recommendations as Your Broker-Dealer or When Acting as Your Investment Advisor?

When we provide you with a recommendation as your Broker-Dealer or 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 may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice that we provide you with.

How Might Our Conflicts of Interest Affect You, and How Do We Address Them?

When we provide you with a recommendation as a broker-dealer or 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 is an example of a potential conflict of interest and how we mitigate that conflict. There are two Investment Management alternatives that are offered for QCM's Wrap Fee Program clients - Internal Portfolio Management (IPM) and External Portfolio Management (EPM). The potential conflict is purely economic. For IPM, the internal investment professional receives a greater amount of compensation, in consideration of the portfolio management service they provide. For EPM, the internal investment professional receives less compensation since the external portfolio manager requires compensation in consideration of their services. We mitigate this conflict by clearly explaining to prospective clients all of the available portfolio structure alternatives and their applicable fees. It is the client that ultimately decides which alternative is more appropriate for them, based solely on their personal preference. In general, the larger institutional accounts are more inclined to opt for the EPM alternative.

How Do Our Financial Professionals Make Money?

All of our Advisors earn a portion of the fees that client accounts are charged. They can also earn fees for time rendered or services provided beyond the scope of the normal investment process. For fee-based accounts in general, since fees are charged as a percentage of the asset value of the account, the larger the account value, the larger the fee that is charged and the more the advisor will earn. If the Advisor is motivated by economics, it will benefit them to increase the value of the account to the greatest extent possible since that will increase the amount they earn. If the value of the account increases, it also benefits the Client, who is the beneficial owner of the account. Therefore, in this scenario, the interests of the Client and the Advisor are aligned, which constitutes a productive relationship between all parties.

Please note that for commission-based transaction accounts, Advisors earn a portion of the commission that you pay on each trade. In the event there are a minimum number of annual transactions executed, it may constitute the more

advantageous structure for clients. However, an excessive amount of commission-based transactions is generally considered to benefit the Advisor vs. the Client since the aggregated value of the commissions directly reduces the portfolio rate of return. Additionally, it may be prudent for the client to retain a particular investment, however, selling it to earn a commission for the Advisor may create a conflict between the Client and Advisor. This is why we generally discourage commission-based vs. fee-based compensation that is directly correlated to account value, described above.

Because of the complexity of the financial marketplace, retaining a professional can make sense to many investors. Furthermore, choosing a brokerage service or an investment advisory service can often come down to how you prefer to be charged in terms of fees and the frequency of transactions in your account. Clients who will have fewer transactions in their account and do not require extensive investment advice or investment management services may benefit from a brokerage relationship. However, clients who wish for us to actively manage their accounts, will most likely benefit from paying a management fee as opposed to transactional costs.

**Conversation starter- Ask your financial professional:
How might your conflicts of interest affect me and how will you address them?**

Do you or your Financial Professionals Have Legal or Disciplinary History?

Yes. Visit Investor.gov/CRS for a free and simple search tool to research our firm and financial professionals. This information is also available on brokercheck.finra.org or by requesting a copy of our Firm Brochure Part II.

**Conversation starters- Ask your financial professional:
As a Financial professional do you have any disciplinary history? For what type of conduct?**

Who Will Be My Primary Contact Person?

The Advisor at our firm that you choose to work with will be your primary contact. Alexander Quint is the Chief Compliance Officer; should you have any questions, comments or concerns with the financial professional serving your account. Contact information is as follows:

Alexander N. Quint
230 Park Avenue, Suite 908
New York, NY 10169-0499

(212) 682 5090 – Tel
aquint@quintcapital.com
www.quintcapital.com