

Form ADV Part 3: Relationship Summary

Brightstone Capital Management, LLC

Date of Form ADV Part 3 – March 14, 2024

Item 1 - Introduction:

Brightstone Capital Management, LLC (“Brightstone”) is an SEC-registered investment adviser that provides advisory services. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – Relationship Services

We offer investment advisory services, on a discretionary basis, to individuals (our “retail investors”). When you hire us, we will continuously monitor your account and discuss your portfolio with you at least annually. On a discretionary basis means that we will have the authority to determine the type and amount of securities to be bought or sold in your account. For more information about these services please see Item 4 of our ADV Part 2A, [available here](#).

Monitoring. Portfolio management and trading services are conducted continuously. All accounts are reviewed by the portfolio manager at least quarterly. Client cash flows, client requests, external events, economic or market related conditions could also trigger account review.

Investment Authority. When granted full discretion over the account, we will have the authority to make investment and trading decisions in the account. If we manage the client account on a nondiscretionary basis, the client must approve any transactions we make in their account.

Investment Offerings. We do not currently limit our advice to proprietary products, or a limited menu of products or types of investments.

Requirements. We impose a minimum account size of \$250,000. This amount may be waived at our discretion. For additional information, see Items 4 and 7 of our ADV 2A, [available here](#).

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay? Brightstone charges advisory fees based on a percentage of a client’s assets under management. All fees are payable monthly and billed in arrears. Fees are calculated based on the market value of the account as of the end of the calendar month. The more assets there are in your advisory account, the more you will pay in fees; thus, the firm may have an incentive to encourage you to increase the assets in your account. The fees you pay to us do not include the fees and expenses charged to you by: mutual funds, ETFs or other investment pools to their shareholders, third-party money managers, or administrative fees and other operational related fees and expenses; commissions or transaction costs charged by your custodian or the executing broker we may select when purchasing or selling securities; and custody and related administrative fees charged by broker dealers and custodians.

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| <ul style="list-style-type: none"><input type="checkbox"/> Help me understand how these fees and costs might affect my investments.<input type="checkbox"/> If I give you \$1,000,000 to invest, how much will go to fees and costs?<input type="checkbox"/> How much will be invested for me? |
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Custody and related administrative fees charged by broker dealers and custodians. 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 additional information, please see Item 5 of our ADV 2A, [available here](#).

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. As part of our arrangement with large broker-dealers, they provide our investment professionals access to products and services that assist us in managing and administering your account(s). This includes research, brokerage services, software and other technology. Thus, a conflict exists as we have an incentive to select a broker-dealer based on our interest in receiving the research or other products or services, rather than on the clients' interest in receiving lower fees and commissions through another broker-dealer. For more information about our conflicts, please see Items 10 and 12 of our ADV Part 2A, [available here](#).

How do your financial professionals make money? Our advisors are compensated solely for the services they provide and not for the investment products we recommend.

Key questions to ask:

- 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?

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No. A free and simple search tool to research us and our financial professionals is available at Investor.gov/CRS.

Item 5 – Additional Information

Additional information about our investment advisory services and an up-to-date copy of the relationship summary is available by contacting us at +1 (740) 409-8235 or contacting the Chief Compliance Officer, Mr. Andy Jogie, at Brightstone1967@gmail.com.

- ☐ Who is my primary contact person?
- ☐ How might your conflicts of interest affect me and how will you address them?
- ☐ As a financial professional, do you have any disciplinary history?
- ☐ For what type of conduct?
- ☐ Is he or she a representative of an investment adviser or broker-dealer?
- ☐ Who can I talk to if I have concerns about how this person is treating me?