

OCCAM CAPITAL® MANAGEMENT, LLC
Form CRS – Client Relationship Summary
March 28, 2024

Occam Capital® Management, LLC (“Occam Capital®,” “we,” “us,” or “our”) is registered as an investment adviser with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/crs, which also provides educational materials about broker-dealers, investment advisers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We provide investment advisory services to individuals, high net-worth individuals, trusts, and estates. Our investment management services include managing your investment assets in portfolios that we construct. Subject to certain exceptions, we prefer a portfolio minimum of \$200,000 for new advisory services engagements. To determine your needs, we request and use data regarding your financial circumstances, investment goals and objectives, tax status, and other factors to tailor our advice and design an investment portfolio that assists in meeting your investment goals and financial objectives.

We only use discretionary trading authority to manage portfolios. Upon signing our investment management agreement for advisory services, you grant our firm discretionary trading authority. Discretionary trading authority is used to make decisions (initial and ongoing) about your investment portfolio(s) without prior approval. Although we do not seek prior approval when using discretionary authority, we rely on the analysis of your financial circumstances, risk tolerance, goals, objectives, and tax status to support the decisions regarding investment assets for your portfolio(s). Client portfolios are typically invested in equities (small-cap, mid-cap, large-cap, etc.), preferred stocks, international equities (ADRs), investment-grade taxable corporate bonds, tax-exempt corporate bonds, and cash equivalents. Based on your needs, risk tolerance, and objectives, we also incorporate exchange-traded funds, mutual funds, below-grade bonds, and other fixed-income securities. Also, although we have discretionary authority, you may impose reasonable restrictions on our authority. Typical restrictions might include investments in certain asset classes, industries, companies, or specific dollar amounts in the foregoing.

We monitor your investment portfolio(s) continuously during our advisory relationship. We use our discretionary trading authority to make adjustments to the investments in your portfolio(s) as a result of changes in economic or market conditions or other relevant factors, such as changes in your financial circumstances.

We offer hourly investment consulting for advice regarding your existing portfolios as a separate service. We do not require a minimum portfolio value for hourly consulting advisory services. Our hourly investment consulting services typically include securities analyses, investment performance verification, and assessment of investment management techniques. You will sign a consulting services agreement that specifies the agreed-upon services, reports, and/or analyses outlining the hourly rate and the number of hours required to complete the services. There are no ongoing reviews for investment consulting services.

For additional information, please use these hyperlinks to access and review the following sections of our Brochure: [Item 4 - Advisory Business](#), [Item 7 - Types of Clients](#), and [Item 16 - Investment Discretion](#).

Conversation Starters. Ask your financial professional:

- **Given my financial situation, why 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?

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.

Our firm charges an annual asset-based advisory fee for investment management services. The advisory fee is based on a percentage of the investment assets we manage for you. Our fee schedule for investment management services is published in the Fees and Compensation section of our Brochure. Our investment advisory fee schedule is negotiable.

We bill you quarterly in advance for our investment management services. Quarterly in advance means at the beginning of each quarterly period (i.e., Jan 1., April 1, July 1, Oct. 1). The advisory fee calculation is based on the value of the investment assets in your portfolio(s) on the last trading day of the previous quarter (i.e., Dec 31., Mar 30, June 30, Sept. 30). We typically receive authorization to deduct fees directly from your accounts. This authorization is incorporated into our investment management agreement. You also have the option to pay our firm by check directly.

There are additional fees and costs associated with investing. The fees and costs are in addition to the advisory fees you pay us. The additional fees and costs include transaction costs, internal mutual fund expenses, electronic fund transfer fees, mailing fees, insufficient funds fees, wire transfer fees, and regulatory fees for securities sold, among other fees. Please inquire about additional fees and costs that impact your investment assets and portfolios. We will provide a detailed listing of fees and expenses upon your request.

Our advisory fees for investment consulting services are \$200 per hour for research and advice by principals and \$75 for administrative tasks by assistants. Upon completion of the agreed-upon consulting services, we will provide an invoice for the advisory fees due. Payment is due upon the client's receipt of our advisory fee invoice. For additional information, please use the hyperlink to access and review the following section of our Brochure: [Item 5, Fees and Compensation](#).

Conversation Starter. 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 that we provide you. Here are some examples to help you understand what this means.

Our legal obligation to you requires us to act with a substantial duty of care and operate pursuant to a commitment of loyalty, which means that we are required to provide advice and recommendations that are in your best interest.

In adhering to our duty of care mandate, we must obtain detailed information regarding your financial circumstances and ensure our recommendations align with your financial situation. We must also conduct due diligence regarding the investments we recommend to you and monitor our recommendations continually over the advisory relationship.

Our duty of loyalty to you requires our firm to provide advice that is free from self-interest and to always place your interests before our own. We must make full and fair disclosure of all material facts related to our advisory services. We are also required to avoid or disclose circumstances where our interests actually conflict, could potentially conflict, or have an appearance of conflict with your interests.

We have inherent conflicts of interest related to how our firm conducts business and makes money. Some of our business arrangements create conflicts of interest. For instance, we receive an economic incentive from the account custodian that provides custody and safekeeping for your investment assets and portfolios. As a result of our agreement with the account custodian and recommendation that you use them, our firm is provided with certain support products and services that directly benefit our advisory business. This business arrangement creates a conflict of interest because we have an economic incentive to make these recommendations.

The way our firm makes money conflicts with your interests. We make money by charging you an asset-based investment advisory fee. The prospect of additional advisory fee revenue incentivizes us to encourage you to invest more assets with us. We earn additional advisory fees as a result of managing more investment assets for you. The incentive to increase our assets under management and fee revenue creates an inherent conflict with your interests.

For additional information, please use the hyperlinks to access and review the following section of our Brochure: [Item 11 - Code of Ethics](#) and [Item 12 - Brokerage Practices](#).

Conversation Starter. Ask your financial professional:

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

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professional is paid by member draw based on firm revenue. As an investment advisory firm, we do not provide direct or indirect compensation based on sales incentives, minimum asset quotas, or transaction-based sales.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

NO; neither our firm nor financial professional has a legal or disciplinary history. You can visit www.investor.gov/CRS for a free and simple search tool to research our firm and financial professional.

Conversation Starter. Ask your financial professional:

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

For additional information about our investment advisory services, visit our website, www.occamcapital.com, or review a full copy of our Brochure, as attached. If you would like additional, up-to-date information or a copy of this relationship summary, please contact us at (585) 218-0310 or (877) 218-3979. You can also email Priscilla Baker Jones, our chief compliance officer, at pbakerjones@occamcapital.com.

Conversation Starters. 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?