

GALLACHER

CAPITAL MANAGEMENT

Client Relationship Summary (Form CRS/Form ADV Part 3) – March 2024

Item 1. Introduction

Gallacher Capital Management, LLC (“GCM”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Clients and prospective clients should be aware that services and fees differ between investment advisers and it is important for retail investors to understand the differences. Free tools are available to research advisory firms and financial professionals at investor.gov/CRS, which also provides educational materials about investment advisers and investing. Please note each of the following sections contains conversation starters intended to help engage clients and prospective clients in useful and informative conversations with their financial professionals.

Item 2. Relationships and Services

What investment services and advice can you provide me?

GCM offers various types of advisory services including GCM investment advisory programs, asset allocation strategies, financial planning services, affiliated and unaffiliated private investment funds and retirement plan consulting services. Investment Advisory services are offered primarily through GCM’s Investment Advisor Representatives (“IAR”) and account(s) are held at an independent custodian. GCM does not take custody or possession of your assets except for investments in affiliated private investment funds. Your IAR works with you to examine your current financial situation and financial goals, to understand your risk tolerance and investment time horizon, and uses that information to develop your overall financial plan/investment strategy.

In a discretionary account, at the outset of the contractual relationship via an Investment Advisory Agreement (“IAA”), GCM is granted the authority to determine the securities or other assets to purchase or sell in the account. This discretion will remain in effect unless revoked by you or your IAR. Account(s) will be monitored on an ongoing basis. Securities and other assets in the account(s) will be purchased and sold consistent with the investment strategy or strategies selected as part of your overall investment plan, subject to any reasonable restrictions provided in writing to GCM.

GCM may also provide investment advice regarding both affiliated and unaffiliated private investment funds. GCM, on a non-discretionary basis, may recommend that certain qualified clients consider an investment in private investment funds. In a non-discretionary arrangement, you will have the ultimate decision regarding the sale or purchase of investments. No client is under any obligation to become a fund investor.

GCM does not have a stated account minimum for Investment Advisory services.

Additional information on relationships, fees and services can be found in the GCM Form ADV Part 2A - Items 4-7 which is available on their website at gallachercapital.com or adviserinfo.sec.gov.

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 licenses, education, and other qualifications? What do these qualifications mean?

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

What fees will I pay?

Investment advisory fees and management fees are based on a percentage of the value of the assets being managed. These fees are generally payable quarterly in advance, but certain accounts may be billed in arrears. A general fee schedule for investment advisory services is included in the GCM Form ADV Part 2A - Item 5 and IAA. The actual percentage amount you pay may be lower than that shown on the schedule, depending on the arrangements with your IAR. GCM also charges fixed fees for financial planning and retirement plan consulting. Performance fees are applicable only to affiliated private investments as disclosed in Form ADV Part 2A - Item 6. IARs retain full authority to negotiate advisory fees.

GCM's fees are exclusive of transaction fees, custodial fees, SEC fees, wire and electronic transfer fees, and other related costs and expenses which are incurred by the client from custodians and other third parties. GCM charges fees based on asset balances, meaning the more assets included in an advisory account, the more fees the client will pay. This could create a conflict of interest given they may have an incentive to encourage clients to increase the balance of their asset accounts.

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. It is important for you to ensure you understand what fees and costs you are paying. Additional information can be found in the GCM Form ADV, Part 2A - Items 5-6, which is available on their website at gallachercapital.com or adviserinfo.sec.gov.

Conversation Starter - 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 GCM acts as your investment adviser, GCM is required to act in your best interest and not put GCM's interest ahead of yours. At the same time, the way GCM makes money creates some conflicts with your interests. You should understand and ask GCM about this and other potential disclosed conflicts because they can affect the investment advice GCM provides you. Here are some examples to help you understand what this means:

GCM and/or its IARs can earn compensation from proprietary investment strategies and affiliated private funds that may exceed the fee that GCM would earn under its standard asset-based fee schedule referenced in Form ADV Part 2A - Item 5. The recommendation that a client invest in proprietary investment strategies and/or affiliated private fund presents a conflict of interest; no client is under any obligation to participate in these investments. GCM has adopted a Code of Ethics describing its standards of business conduct, potential conflicts of interest and fiduciary duties.

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

Additional information on conflicts of interest can be found in GCM's Form ADV Part 2A - Items 4,6,10,11,12 and 14 on their website at gallachercapital.com or adviserinfo.sec.gov.

How do your financial professionals make money?

GCM IARs are compensated based on a portion of the fees paid to GCM for advisory services. IARs may also be licensed insurance agents and may receive related compensation. Refer to the IAR's Brochure Supplement - Form ADV Part 2B for specific information.

Item 4. Disciplinary History

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

No, please visit Investor.gov/CRS for free and simple search tools to research GCM and their financial professionals.

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

Item 5. Additional Information

If you have any questions about the services at GCM or if you wish to request a copy of the relationship summary, please contact GCM at 303-708-1640 or gcmadmin@gallachercapital.com. Additional information is also available on the SEC's website at adviserinfo.sec.gov.

Conversation Starters – Who is my primary contact person? Is he or she a representative of an investment adviser? Who can I talk to if I have concerns about how this person is treating me?