

ProFocus

Client Relationship Summary – February 2024

ProFocus Incorporated (“ProFocus”) is an investment adviser registered with the U.S. Securities and Exchange Commission. Investment advisory and brokerage services and fees differ; therefore, 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](https://www.investor.gov/crs), which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, including asset management and financial planning. Asset management services include portfolio management by ProFocus. As part of our standard services, we monitor clients’ portfolio holdings and the overall asset allocation strategy on an annual basis, or when market conditions or other triggers would warrant a review. Triggers include changes in a client’s economic circumstances, or significant changes in the securities markets or economic environment. Financial plans, once prepared, are not monitored unless you request an update to the plan.

We offer our asset management services on a discretionary or nondiscretionary basis. Discretionary asset management allows us the limited authority to buy and sell investments in your account without asking you each time a transaction is placed. With non-discretionary asset management, we provide investment recommendations but require your approval before placing trades for your account. You make the ultimate decision regarding the purchase or sale of investments. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

We provide investment recommendations and construct portfolios using a wide array of securities types to meet the investment objectives of clients. We do not have any minimum requirements for opening or maintaining accounts for retail investors. Our minimum initial requirements for opening accounts for retail investors is \$100,000, but we may accept accounts for less than the minimum.

For additional information, please see our Form ADV Part 2A (with special emphasis on Items 4, 7, and 16), which can be obtained by calling us at (408) 598-9960.

Conversation Starters – Ask Your Financial Professional:

Given my financial situation, should I choose investment advisory services? 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?

Principal Fees: We are compensated for providing the investment advisory services by charging an ongoing asset-based fee that ranges from 0.5% to 2.00% per annum depending on the value of the assets we manage for you, the complexity of the investment portfolio, expected transaction activity in the account, or other reasons agreed with you. For trusts other than living trusts, the minimum fee is 2.0% per annum. For clients with more than \$250,000 being managed by ProFocus, financial planning with up to two meetings per year is included in the asset management fee. If the client meets with ProFocus more than two times per year, ProFocus will invoice the client at an hourly rate of \$325 per hour. For clients with \$250,000 or less being managed by ProFocus, any financial planning services will be invoiced at an hourly rate of \$325 per hour. The minimum fee for asset management is \$125/quarter. Fees are billed quarterly in arrears based on the value of portfolio assets on the last business day of the quarter and are negotiable. With the asset-based fee, the more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account. Financial planning services are provided based on an hourly fee rate of \$325 per hour, and the hourly fee rate may be negotiated in advance. The fee is payable quarterly and upon completion of work performed.

Other Fees and Costs: ProFocus’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. You may incur certain charges imposed by custodians, brokers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Exchange traded master limited partnerships and exchange traded funds also charge internal management and other fees, which are disclosed in the partnerships’ and funds’ prospectuses or other documents. These fees

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will generally include a management fee and other fund expenses. All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by such partnerships and funds to their investors and shareholders.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **More detailed information about our fees and costs are included in our Form ADV Part 2A (Item 5).**

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 we provide you. Here is an example to help you understand what this means.

ProFocus and its Investment Advisor Representatives (IARs) are allowed to invest for their own accounts in the same securities that we recommend or acquire for your account, and may engage in transactions that are the same or different than transactions recommended or made for you. This creates a conflict of interest that we mitigate by maintaining a Code of Ethics and compliance program that sets forth a standard of conduct that must be adhered to by all ProFocus personnel. **These arrangements and additional information about other conflicts of interest are discussed in more detail in our Form ADV Part 2A.**

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 IARs are compensated through the receipt of a portion of revenue we receive for the advisory services we provide. The portion paid to your IAR generally does not vary based on the type of investments that are recommended.

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

No. We invite you to visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research our Firm and financial professionals.

Conversation Starter – Ask Your Financial Professional:

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

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on [Investor.gov](https://www.investor.gov) or adviserinfo.sec.gov (CRD# 113954). Alternatively, you can call us at (408) 598-9960 to speak with us directly, to request up-to-date information, and request a copy of the relationship summary.

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?