

**GUIRY CAPITAL MANAGEMENT**  
**3801 PGA Blvd., Suite 600**  
**Palm Beach Gardens, FL 33410**  
**Tel: 561-337-5224**

**GUIRY CAPITAL MANAGEMENT LLC: Form ADV Part 3, March 27, 2024**

## **I. Introduction**

Guiry Capital Management LLC (“GCM”) is registered with the 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 broker-dealers and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS) which also provides education materials about broker-dealers, investment advisers, and investing.

## **II. What Investment Services And Advice Can You Provide Me?**

We offer investment advisory services to investors. The investment advisory services we provide to retail investors include accounts for individuals, joint accounts, trust accounts, and retirement accounts. We provide investment advisory services on either a non-discretionary or discretionary basis. In a non-discretionary account, prior to each securities transaction, GCM obtains approval from you before executing the transaction (buy or sell). In a discretionary account, we have your authorization to buy and sell securities in your account without your permission. You may limit our discretion by directing us to retain certain positions, or limit or exclude investment in certain asset classes or securities. Your investment advisory agreement with us will indicate either a non-discretionary or discretionary relationship.

As part of our standard advisory services, we monitor the securities held in your account on an ongoing and continuous basis. We typically provide frequent and periodic reviews to show account activity and investment returns. Our reviews are also meant to monitor your investment portfolio for compliance with your investment objectives and risk tolerance. Your particular situation is taken into consideration with regard to the investments we recommend or choose for you. Our investments may include cash, fixed income, equities, mutual funds, exchange traded funds, alternative investments, and hedged strategies. We may also recommend separately managed accounts to diversify your portfolio by accessing experienced third-party managers. As a fiduciary, we are bound by law to act in your, the client's, best interest. Meeting our fiduciary responsibility involves knowing your specific financial needs and goals as well as understanding your risk tolerance. You are responsible to inform us of any changes in your investment objectives and/or financial situation.

GCM does not impose an account minimum. GCM does not custody or take possession of your assets.

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### **II. What Investment Services And Advice Can You Provide Me? (continued from previous page)**

Unlike banks and brokerage firms, we do not sell insurance or financial products that charge a commission resulting in additional costs. Our firm provides fee-based investment services. When you do well, we do well.

#### **Conversation Starters.** Questions to Ask Your Investment Advisor:

- *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?*

### **III. Fees, Cost, Conflicts and Standard of Conduct**

#### **What fees will I pay?**

Most of our clients pay investment advisory fees as a percentage of assets under advisory or management. In some circumstances, we are paid fixed fees. GCM advisory fees are generally paid quarterly in advance (meaning we bill you at the beginning of the three-month billing period), but certain accounts may be billed in arrears. A general fee schedule is included in our Form ADV 2A (Item 5). With your consent, GCM may deduct advisory fees from your account(s).

Guiry Capital Management's fees are exclusive of brokerage commissions, transaction fees, custodial fees, exchange fees, SEC fees, transfer taxes, wire transfer, electronic fund fees, and other related costs and expenses which are incurred by the client from brokers or 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.

#### **Conversation starters.** Questions to Ask Your Investment Advisor:

- *Help me understand how these fees and costs might affect my investments. If I give you \$100,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

## **GUIRY CAPITAL MANAGEMENT LLC: Form ADV Part 3**

### **What are your legal obligations to me when acting as my investment adviser? How does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we are required to act in your best interest and not put our interest ahead of yours. It is important that we identify potential conflicts of interest for you: the more assets we manage for you, the greater our fee and so we have an incentive to encourage you to increase account assets. GCM has adopted a Code of Ethics describing its standard of business conduct, and potential conflicts of interest and fiduciary duties.

#### **Conversation starters.** Questions to Ask Your Investment Advisor:

- *How do your financial professionals make money?*

Our employees are salaried positions. The financial success of the firm benefits all employees. No employee nor the firm receives commissions, gifts, or incentives for investments made in clients' accounts.

## **IV. Disciplinary History**

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

Guiry Capital Management LLC and its employees have not been subject to any disciplinary events by regulators nor is Guiry Capital Management LLC and its employees a party to any legal events material to client evaluation of our advisory business. You can visit [Invest.gov/CRS](http://Invest.gov/CRS) for free and simple search tools to research us and our financial professionals.

## **V. Additional Information**

For additional information on our investment advisory services, please see our Form ADV Part 2a. Investors can find further additional information about our services at our website [www.guirycapital.com](http://www.guirycapital.com) or you may call us at 561-337-5224 or 212-332-1620.

#### **Conversation starter.** Questions to Ask Your Investment Advisor:

- *Who is my primary contact?*
- *Is he or she a representative of an investment adviser or a broker dealer?*
- *Who can I talk with if I have concerns about how this person is treating me?*

Your primary contact is Martin Guiry who is chief investment officer of Guiry Capital Management, LLC, a Registered Investment Adviser. We are not a broker dealer. Our office staff is available at 561-337-5224.