

Introduction

Gibraltar Capital Management, Inc. ("Gibraltar") is registered with the Securities and Exchange Commission (SEC) as an investment adviser. We provide investment advisory services. We do not provide brokerage 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.

What investment services and advice can you provide me?

Our primary business is managing your investment portfolio on a discretionary basis and providing financial advice for a myriad of private client matters. We offer this service through the selection of various publicly traded securities - including mutual funds, exchange traded funds, stocks, and bonds in taxable and tax deferred accounts. A qualified custodian, Fidelity, holds the assets in your account in your name. We agree upon terms in writing (via an Investment Management Agreement) that specifies the discretionary authority we have to buy and sell investments in your account without asking you in advance. We include monitoring of your accounts as part of our standard service, and we review your portfolio on a regular basis. The only limitations on the investment authority are those limitations you impose in writing. For on-going monitoring, we review your current financial situation and prepare recommendations in accordance with your goals and objectives. In making investment decisions, we rely on your input that we get in person and in writing. We tailor our investment portfolios to your individual needs by educating ourselves on your financial circumstances and preferences and then applying the principles that we describe in our **ADV 2A brochure ("Brochure"), Item 4, page 4**. Generally, there are no limitations to the types of investments we offer clients.

We also note that we serve as an investment adviser to real estate funds that are exempt from registration under the Securities Act of 1933 as well as the Investment Company Act of 1940. Accordingly, the interests in those funds are available exclusively to investors that meet specific eligibility and suitability requirements required to satisfy those exemptions. **We specifically describe the funds in Item 4, pages 4 and 5, of our Brochure**. We suggest a minimum total accounts' value of no less than \$500,000 per household. However, we use that as a guideline only – all minimum requirements are subject to negotiation at our sole discretion.

Conversation Starters - Ask your Financial 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 your licenses, education, and other qualifications? What do these qualifications mean?**

Our Brochure is located at <https://adviserinfo.sec.gov/firm/brochure/122328>. Please refer specifically to Item 4, pages 4 and 5, for a complete description of the services we provide and Item 7, page 6, for description of the types of clients we serve.

What Fees Will I Pay?

We charge a fee every three months (quarterly) in arrears based on a percentage of assets under management. Our fee structure is a blended fee in which we charge 1.10% on the first \$1 million, 1.0% on the next \$2 million, 0.80% on the next \$2 million, 0.60% on the next \$5 million, and 0.50% on the next \$15 million. **Please refer to Item 5, page 5, in our Brochure for an overview of the fee structure and an example table of overall annual fees. For a description of the fee structure for the real estate funds, please refer to Item 5, page 6, of our Brochure**. We customarily cover any brokerage commissions, transaction fees, and wire transfer fees at our discretion. Mutual funds and exchange traded funds also charge internal management fees, which they disclose in the prospectus for those funds. You are responsible for these fees, in addition to investment-related taxes. We do not receive any portion of these transaction costs. Since we collect an asset-based fee, the higher the value of your account, in general the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account. **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.**

What are your legal obligations to me when providing recommendations? 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. For example:

- To the extent our clients invest in our affiliated funds, we may receive higher fees than we would otherwise receive. Because we stand to earn additional fees associated with this investment, we have an apparent incentive to direct client investments to these vehicles, as opposed to separately managed accounts where we do not earn those additional fees.
- We use Fidelity, as custodian for client accounts. Fidelity's services include research, brokerage, custody and access to mutual funds and other investments that are otherwise available only to institutional investors. We conduct an annual client appreciation event, to which Fidelity contributes to the cost of holding the event. These other products and services assist us in managing and administering client accounts.
- The Firm's affiliate also provides tax preparation and bookkeeping services through an accounting firm Gibraltar has acquired. In addition, an affiliate of the firm provides business consulting services and executive leadership. The terms of these services type of engagement are negotiated on a case-by-case basis. Additionally, the Firm may provide clients or prospects with financial planning advice.
- In addition, we have a referral arrangement with a solicitor where the solicitor refers prospects to the firm. We compensate the solicitor for these referrals. **For additional information on this arrangement, please see our Form ADV Part 2A, Item 14.**
- In our capacity as investment adviser to the funds, we have a potential conflict of time spent on management of the funds versus our other advisory activities. In addition, one of our principals serve as trustee for certain trusts that are also clients of the Firm. This creates an apparent conflict where we could favor these clients over others. The principals of our firm also engage in outside business activities. Further, while the Funds we advise are currently closed to new investors, under certain circumstances, investable cash may become available in those Funds so that further investments may be made, thereby creating a conflict as to which fund would make an available investment opportunity.

Please refer to Item 10, pages 7 and 8 of our Brochure for a description of these conflicts and how we address them.

Conversation Starters – Ask your Financial Advisor

- 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?

How do your financial professionals make money?

We are compensated based on salary. There is no compensation for our employees based on the time and complexity required to meet a client's needs, the amount of client assets they service, the products sold, or product sales commission. There is no non-cash compensation for our employees.

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

No. You can visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our financial professionals.

Conversation Starters – Ask your Financial Advisor

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

Additional Information

Additional information about our advisory services is available at the following:

- Our company website: <https://www.gcmwealth.com/>
- The SEC website: <https://adviserinfo.sec.gov/firm/summary/122328>
- If you would like to request a copy of this relationship summary, contact us by telephone at 918-492-420

Conversation Starters - Ask your Financial Advisor:

- 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?