

## DISCLOSURE BROCHURE PART 3 FORM CRS

### Relationship Summary

Frank Capital Partners LLC

March 1, 2024

#### **Item 1. Introduction**

Brian Frank is registered with the Securities and Exchange Commission as an Investment Advisor. Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the differences. Free and simple tools are available to research firm and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Registration with the SEC or any state securities authority does not imply a certain level of skill of training. Additional information about FCP is available on the Securities and Exchange Commission's website at <http://www.adviserinfo.sec.gov>.

#### **Item 2: Relationships and Services**

##### *A. What Investment Services and Advice Can You Provide Me?*

Frank Capital Partners LLC (FCP) offers investment advisory services to retail investors. FCP offers investment advice for stocks, bonds, and mutual funds. FCP monitors retail investors' investments daily. This is included in FCP's standard services. FCP accepts discretionary authority to make investment decisions in stocks, bonds, and mutual funds. FCP does not offer advice only with respect to proprietary products. FCP does not have a minimum account size or investment amount.

Frank Capital Partners LLC is an investment adviser with its principal place of business in Key Biscayne, Florida. FCP provides continuous and regular investment management services on a discretionary basis to individuals, private funds, and multiple series of a registered investment company. We recommend, buy, sell, and monitor common stocks, bonds, and other securities with the aim of creating diversified portfolios, with positions generally held for long-term gains.

As of December 31, 2023, FCP had approximately \$33.1 million of client assets under management, all of which are managed on a discretionary basis. FCP has been in business since June 2003. FCP has two principal owners, Monique Weiss and Brian Frank. FCP manages separately managed accounts for individuals and trusts. FCP does not impose a minimum account size.

*Conversation Starter:* Given my financial situations, 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?

#### **Item 3: Fees, Costs, Conflicts, and Standard of Conduct**

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

FCP charges an annual fee of 0.99% to retail clients billed quarterly in arrears. This is the principal fee for FCP's advisory services. An investment adviser that charges an asset-based fee could face a conflict of interest because the more assets there are in a retail investor's advisory account, the more a retail investor will pay in fees, and the firm may therefore have an incentive to encourage the retail investor to increase the assets in his or her account. Other fees and costs the retail investor will pay directly or indirectly include: brokerage, custody, margin interest, and other services by banks and broker-dealers, although FCP does not receive or collect these fees. 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. FCP is paid a percentage of the assets under management. For the Frank Value Fund, The Frank Value Fund SP, and the West Hills Core Fund, the fee is computed and billed to clients quarterly in arrears. For separate account clients, the fee is computed and billed to clients quarterly in arrears, in the first month after the end of each quarter (January, April, July and October). FCP generally charges clients an annual fee of 0.99% assets, although it has discretion to charge lower rates for certain accounts. Clients may also be charged fees for brokerage, custody, margin interest, and other services by banks and broker-dealers, although FCP does not receive or collect any of these fees.

*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 advisor? How else does your firm make money and what conflicts of interest do you have?* When we act as your investment adviser, we must 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 are some examples to help you understand what this means. A. Proprietary Products: FCP is the Investment Advisor to the Frank Value Fund, Frank Value Fund SP, and West Hills Core Fund. FCP receives a management fee from these funds and may also recommend them to advisory clients. When possible, FCP aims to reimburse retail investor advisory fees to offset proprietary product management fees and avoid this conflict of interest. B. Administration and compliance fees. FCP provides administration and/or compliance services to the Camelot Event-Driven Fund and other outside funds. Some of the fees FCP receives are based on asset levels, therefore a conflict exists for FCP to recommend these outside funds to clients. When possible, FCP aims to reimburse retail investor advisory fees to offset administrative and/or compliance fees and avoid this conflict of interest. *Conversation starter:* How might your conflicts of interest affect me, and how will you address them? FCP has a fiduciary responsibility to its clients. Employees have an obligation to act solely in the best interests of clients and disclose all material facts, including cases where the interest of the firm and/or its employees may conflict with the interests of its clients. FCP employees must adhere to the firm's compliance manual, which describes policies and procedures that govern the FCP's operations. Incorporated into the compliance manual is the FCP Code of Ethics, which is available upon request. The Code of Ethics directs each FCP employee to place the interests of the firm and its clients first and also describes policies and procedures for regulating the personal trading activities of FCP employees. In summary, the Code of Ethics states that FCP employees may invest in the same securities (or related securities, i.e. options, warrants, or futures) that FCP invests for, or recommends to, clients. This creates a potential conflict of interest between the employee and FCP clients. To remedy this conflict of interest, FCP employees must place client orders ahead of their personal orders. Generally, FCP employees may not trade the same security on the same day as a client unless the employee's order is blocked (combined with) the client(s)' order(s). FCP also does not allow principal transactions with client accounts or agency cross transactions except as allowed by Section 206(3) of the Investment Advisers Act. FCP employees are prohibited on trading on any insider (material non-public) information.

*How do your financial professionals make money?*

FCP financial professionals are compensated with cash and equity in FCP LLC. This compensation structure could face a conflict of interest because the more assets there are in a retail investor's advisory account, the more a retail investor will pay in fees, and the firm may therefore have an incentive to encourage the retail investor to increase the assets in his or her account. FCP financial professionals are compensated on a percentage of advisory fees earned for the firm.

#### **Item 4: Disciplinary History**

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

No. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research you and your financial professionals. *Conversation starter:* As a financial professional, do you have any disciplinary history? For what type of conduct?

#### **Item 5: Additional Information**

You can find additional information about FCP advisory services at [www.frankfunds.com/investors](http://www.frankfunds.com/investors) and can also view a copy of the relationship summary. For up-to-date information and to request a copy of the relationship summary please call 973-887-7698. *Conversation Starter:* Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?