

FORM CRS

Item 1 – Introduction

Tradewinds Capital Management, LLC (“Tradewinds Capital”, “we”, “our”, or “us”) is registered with the Securities Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differ from a registered broker-dealer, and it is important for you to understand the differences between those structures. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 – Relationship and Services - What investment services and advice can you provide me?

Tradewinds Capital provides discretionary and/or non-discretionary investment advisory services, on a fee-only basis, to individuals, trusts and estates (our “retail investors” or “client”). When a retail investor engages us to provide discretionary investment management services, we shall monitor, on a continuous basis, the investments in the accounts over which we have discretionary authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our discretionary authority over your account(s) shall continue until our engagement is terminated per the terms of our agreement. We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investment.

Tradewinds Capital may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, e.g., estate planning, insurance planning, etc.) on a stand-alone separate fee basis. We will generally provide such consulting services inclusive of our advisory fee as set forth at Item 5 of our [Form ADV 2A](#). To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance agents, etc.). Clients are reminded that they are under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation made by us. **Additional Information:** For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7 in our [ADV Part 2A](#).

Conversation Starters:

<i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>
<i>How will you choose investments to recommend to me?</i>
<i>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</i>

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

What fees will I pay?

When we are engaged to provide discretionary and/or non-discretionary investment advisory services, our investment advisory fee will be based upon a percentage (%) of the market value and type of assets placed under our management (between 0.40% and 0.90%). This fee will apply to all accounts and all assets in all Tradewinds Capital accounts unless the account qualified for one of the alternative fee schedules. For certain annuity contracts managed by us, we will charge a fee 0.75% on all values. For certain extended family members, we will charge 0.50% on all values. And, for legacy stock, mutual fund and fixed income positions and all other accounts, the fee is 0.00% on all values. Our annual investment advisory fee shall be prorated and paid monthly, in arrears, based upon the average daily market value of the assets during the previous month. To the extent specifically requested by a client, the Registrant may determine to provide financial planning and/or consulting services (including investment and non-investment related matters) on a stand-alone fee basis. Our planning and consulting fees are negotiable, but generally range from \$1,000 to \$2,000 on a fixed fee basis, and from \$150 to \$225 on an hourly rate basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s). For more detailed information regarding our standard fee schedules and our alternative fee schedules, please see Item 5 in our [Form ADV Part 2A](#). **Other Fees and Costs:** Discretionary investment assets will be held with a qualified custodian. Tradewinds Capital will generally recommend that Schwab serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e.

ADV Part 2A: https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=885759

transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to our investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). The fees charged by the applicable broker-dealer/custodian, and the charges imposed at the fund level, are in addition to Adviser's investment advisory fees referenced in Item 5 of our [Form ADV Part 2A](#). **Additional Information:** Because our fee is calculated as a percentage of your assets under management ("AUM"), the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage. 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 understand what fees and costs you are paying. For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [Form ADV Part 2A](#).

Conversation Starters:

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. Below is an example to help you understand what this means:

* We may buy or sell securities that are also recommended to clients. This practice may create a situation where we are in a position to materially benefit from the sale or purchase of those securities. Our Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Conversation Starters:

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

For more detailed information about our *conflicts* of interest, please review Items 4, 11, 12, and 14 of [Form ADV Part 2A](#).

How do your financial professionals make money?

Our financial professionals are compensated on a salary basis and may receive additional compensation based upon assets under their management and the revenue that AUM produces. Some of our professionals may also receive a bonus based upon the profitability of the firm. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No. We encourage you to visit www.investor.gov/CRS to research our firm and our financial professionals. We encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what conduct?*

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Donald Bradley Pence, at any time to request a current copy of our [Form ADV Part 2A](#) or our *relationship summary*. Our Chief Compliance Officer may be reached by phone at (360) 715-9000.

Conversation Starters:

*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?*