



# ALLEN CAPITAL MANAGEMENT

8/19/2024

**ALLEN CAPITAL MANAGEMENT is a registered investment adviser registered with the Securities and Exchange Commission as an investment adviser.**

What investment services and advice can you provide me?

## Relationships and Services

**ALLEN CAPITAL MANAGEMENT** provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, and endowments.

We are an investment adviser and provide advisory accounts and services rather than brokerage accounts and services. This document gives you a summary of the types of services we provide and how you pay.

We are a fee-only firm with **fees based on a percentage of assets under management** or a fixed fee, that are deducted monthly.

ACM regularly reviews the status of all securities in Client accounts. An overall assessment is performed on at least an annual basis. All reviews are based on Clients' stated investment objectives.

More frequent reviews may be triggered by a change in Client's investment guidelines; tax considerations; large deposits or withdrawals; large security sales or purchases; loss of confidence in corporate management objectives; or a change in opinion of particular securities or markets. All reviews are part of our standard service.

We offer advisory accounts for which you exercise discretion (i.e., **discretionary accounts**). A discretionary account allows us to buy and sell investments in the retail investor's account, without asking the retail investor in advance.

In some limited circumstances, Clients grant us **non-discretionary** authority to execute investment decisions in accordance with the directions and preferences provided to us by the Client. Non-discretionary authority requires us to obtain a Client's prior approval of each specific transaction prior to executing investment recommendations.

For more detailed information see: Items 4, 5, 6, 7 & 8 of our Firm Brochure

## **Conversation Starters:**

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?

Our fees are as follows:

<u>Assets Under Management</u>	<u>Maximum Annual Fee</u>
Under \$2,000,000	1.00%
\$2,000,001 – \$6,000,000	.75%
In excess of \$6,000,00	.50%

The amount paid to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted from your account. Our fees may vary and under some circumstances are negotiable. For clients that also have accounts with Allen Trust Company, their accounts values with both institutions will be aggregated for the application of the above fee schedule. The resulting fee is pro-rated amongst the respective accounts.

Clients may be required to pay mutual fund's fees and charges, brokerage commissions, stock transfer fees to the broker executing the transaction. These and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. You pay our fee monthly even if you do not buy or sell.

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:**

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?

For more detailed information see: Item 5 of our Firm Brochure

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. We will earn a fee if you choose us to serve as your investment manager or if you choose Allen Trust Company to be a Trustee. This is an incentive to us since we earn additional fees.

**Conversation Starters:**

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

For more detailed information see: Item 4, 5 and 10 of our Firm Brochure

How do your financial professionals make money?"

Our Financial Professionals are compensated by an annual salary, as well as, sharing in the first year of fees paid to the firm.

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

No.

**Conversation Starters:**

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

For more detailed information see: Item 9 of our Firm Brochure

Additional Information

We encourage you to seek out additional information.

Visit Investor.gov for a free and simple search tool to research our firm and our financial professionals.

To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, investment account or a financial professional, contact us in writing at 701 Columbia St, Ste 104, Vancouver, WA 98660.

Additional information about **ALLEN CAPITAL MANAGEMENT** as well as a copy of this Relationship Summary can be obtained on our website: [www.allencapital.com](http://www.allencapital.com) and by calling our office at (503) 292-1041. Additional information is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with **ALLEN CAPITAL MANAGEMENT** who are registered, or are required to be registered, as investment adviser representatives of **ALLEN CAPITAL MANAGEMENT**.

**Conversation Starters:**

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?"

