

Item 1 - Cover Page

Part 2A of Form ADV: *Firm Brochure*



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This brochure provides information about the qualifications and business practices of Capstone Capital Wealth Advisors. If you have any questions about the contents of this brochure, please contact us at 702-433-7588 or service@capstonecap.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Capstone Capital Wealth Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 123764.

Item 2 - Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur from the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the Firm's last ADV annual update amendment dated March 16, 2023, the Firm had the following changes:

- Items 4 and 5 – updated to include changes to service offerings as well as the fees associated with those service offerings.
- Items 10 and 13 – updated to remove reference to an IAR that is no longer with Capstone Capital Wealth Advisors.
- Item 12 – updated to remove all references to TD Ameritrade because of the merger between TD Ameritrade and Schwab. Client accounts that were previously held at TD Ameritrade transferred to Schwab in September 2023.
- Item 17 – updated to reflect the change in policy that Capstone Capital Wealth Advisors no longer votes client proxies.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us at 702-433-7588 or by email at service@capstonecap.com.

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Item 4 - Advisory Business

Capstone Capital Wealth Advisors is an SEC registered investment adviser with its principal place of business located in Nevada. Capstone Capital began conducting business in 2002.

Capstone Capital Wealth Advisors is owned by Leavitt Holdings LLC and Dawson Holdings LLC. Ronald Leavitt and Adam Dawson are each the sole managing members of their respective holding companies.

As of December 31, 2023, Capstone Capital Wealth Advisors had \$321,304,384 in discretionary assets under management.

Our firm provides continuous advice to clients regarding the investment of their funds, and we tailor our advice to clients' individual needs through personal discussions that establish their goals and objectives based on their particular circumstances, which we use to create and manage their portfolio. As appropriate, we also review and discuss clients' prior investment history, family composition, and background.

We manage clients' advisory accounts on a discretionary basis. Discretionary services allow Capstone Capital Wealth Advisors to enter trades in clients' accounts on their behalf without prior approval. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service and will generally include advice regarding the following securities:

- Exchange-listed securities
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States governmental securities
- Exchange-traded fund shares

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

Retirement Rollovers-No Obligation/Conflict of Interest:

Capstone Capital Wealth Advisors is deemed to be a fiduciary to advisory clients that are employees of benefit plans or individual retirement accounts (IRAs) pursuant to the

Employee Retirement Income and Securities Act (“ERISA”). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interests and not put our interests ahead of yours. To avoid engaging in prohibited transactions, Capstone Capital Wealth Advisors may only charge fees for investment advice about products for which our firm and/or our related persons do not receive fees other than Capstone Capital Wealth Advisor's advisory fees.

While Capstone Capital Wealth Advisors may receive increased compensation as a result of a rollover recommendation, the firm will only make these recommendations in the best interest of the client taking into account such various factors as: i.) the investment options available in the plan versus the investment options available in an IRA, ii.) fees and expenses in the plan versus the fees and expenses in an IRA, iii.) the services and responsiveness of the plan's investment professionals versus those of Capstone Capital Wealth Advisors, iv.) required minimum distributions and age considerations, and v.) employer stock tax consequences, if any. No client is under any obligation to roll over plan assets to an IRA managed by Capstone Capital Wealth Advisors.

There are legacy clients of Capstone Capital Wealth Advisors who receive services with differing fees under engagements that we no longer offer. Capstone Capital Wealth Advisors offers the following services to clients:

INVESTMENT MANAGEMENT

Capstone Capital Wealth Advisors provides ongoing investment management services to clients, and in so doing, we initially review clients' existing investment portfolios and other data to provide investment recommendations and advice consistent with each client's stated financial objectives. Capstone Capital Wealth Advisors takes discretionary authority in clients' accounts to invest their assets according to their stated investment objectives, risk tolerance, investment time horizon, and any restrictions that they might place on their accounts.

Clients understand that Capstone Capital Wealth Advisors will have no responsibility for decisions made by clients that are independent from our advice, and that we will not be responsible for assets not designated for our management or for the diversification of all the client's assets.

FINANCIAL PLANNING

Capstone Capital Wealth Advisors provides clients financial planning services that, depending on the client's needs, may focus on, but are not limited to, the following areas: goal setting, retirement planning, business succession and exit planning, insurance analysis and risk management, charitable giving, legacy planning, tax planning, and investment planning.

Clients understand that the responsibility for financial decision are theirs alone, and that they are under no obligation to follow, either wholly or partially, any recommendations or suggestions provided by Capstone Capital Wealth Advisors.

None of the foregoing services include the practice of law or accounting services.

WRAP FEE PROGRAM

Capstone Capital Wealth Advisors does not offer wrap fee programs.

Item 5 - Fees and Compensation

There are legacy clients of Capstone Capital Wealth Advisors who receive services with differing fees under engagements that we no longer offer. Capstone Capital Wealth Advisors charges fees to clients for its services as follows:

INVESTMENT MANAGEMENT FEES

Capstone Capital Wealth Advisors charges its fee for investment management services as an annual fee calculated as a percentage of assets under management, charged on a quarterly basis, in arrears, according to the following fee schedule:

- 1.00% for the first \$5,000,000
- 0.75% for the next \$5,000,000
- 0.50% for additional assets above \$10,000,000

The client's fee is calculated each quarter using the value of the assets on the last business day of the prior quarter, subject to a \$2,500 minimum fee per quarter. Clients with less than \$1 million under Advisor's management may pay a higher fee percentage than the schedule shown above. When our services begin or terminate on a day other than the first day of a calendar quarter, the fee for the initial or last quarter of services will be prorated based on the number of days under our management.

Clients authorize Capstone Capital Wealth Advisors to deduct our fee directly from their account held at an independent custodian as it becomes due and payable. If clients have more than one account, we make the determination as to which account the fee is taken from based on each client's best interest, or at their instruction. We send clients a billing statement for the amount due each quarter and it is the client's responsibility to verify the fee calculation's accuracy. The account custodian does not determine if a fee is properly calculated. Capstone Capital Wealth Advisors may also accept payment by check in our sole discretion.

FINANCIAL PLANNING FEES

Capstone Capital Wealth Advisors charges its fee for financial planning services as a one-time, fixed fee ranging from \$5,000 to \$20,000 based on the scope of the client's planning needs and the complexity thereof collected in advance.

The financial planning fee is due at the time the client signs their agreement with Capstone Capital Wealth Advisors, and it is payable by check, credit card, or debit card. Upon early termination of the engagement, Capstone Capital Wealth Advisors will prorate the refund of any unearned, prepaid fee paid for financial planning services based on the services provided prior to termination, in our sole discretion.

Limited Negotiability of Advisory Fees: Although Capstone Capital Wealth Advisors has established the fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These considerations include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific quarterly fee schedule will be identified in the contract between Capstone Capital Wealth Advisors and each client.

GENERAL INFORMATION

Termination of the Advisory Relationship: Any engagement agreement may be canceled at any time without penalty, by either party, for any reason. To initiate a termination, the client must notify Capstone Capital Wealth Advisors in writing. If an agreement is canceled within five business days after the effective date of the agreement a client will receive a full refund of fees. After five days, all fees owed to us for work performed before termination and all credits owed to the client for fees paid that remain unearned at time of termination become due immediately. We reserve the right to value a client's account, prorate the fee and automatically debit the fees owed to us anytime during this termination period. Fees for work completed up to the termination date will not be refunded. We agree to provide investment services and reasonable logistical support in transferring the client's account effectively ending our management of the account. If a client terminates our services and later decides to use our services again, the client will enter into a new agreement.

Mutual Fund and Exchange Traded Fund ("ETF") Fees: All fees paid to Capstone Capital Wealth Advisors for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in a mutual fund or ETF directly, without our services. In this case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which type of securities are most appropriate for each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also

responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer when an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Capstone Capital Wealth Advisors may charge up to \$500.00 per hour for work not related to investment advisory services. This fee applies to clients that are not receiving our investment advisory services. This could include asset registration or re-registration or consultation on investments not held at our firm.

Item 6 - Performance-Based Fees and Side-By-Side Management

Capstone Capital Wealth Advisors does not charge any performance-based fees and does not use side-by-side management.

Item 7 - Types of Clients

Capstone Capital Wealth Advisors provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit-sharing plans (other than plan participants)
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed

Capstone Capital Wealth Advisors has a minimum account size of \$1 million for new clients. Exceptions may be allowed in certain instances at the sole discretion of Capstone Capital Wealth Advisors.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. We base asset allocation decisions on academic and long-term market research, not economic conditions, or short-term market predictions. We strive to choose mutual funds or ETFs with broad market exposure, low turnover, and low management fees. We also pay close attention to how the holdings of various funds relate to each other, to improve diversification and minimize overlap.

Capstone Capital Wealth Advisors' investment strategies have a long-term focus and are closely coordinated with each client's specific investment objectives, risk tolerance, investment time horizon and liquidity needs. Capstone Capital Wealth Advisors determines and builds the portfolio with the client. If a client already owns certain securities, the appropriateness, constraints, and all other factors are considered in deciding whether to sell them or retain them in the overall investment plan.

We may periodically rebalance client portfolios as markets fluctuate, to bring portfolios back to their original target allocation. Otherwise, portfolio allocations may gradually fall outside the client's risk tolerance.

Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk. Clients should understand that investing in any securities, including mutual funds and ETFs, involves a risk of loss of both income and principal. The following are some of the investment risks faced by investors:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar last year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 - Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's

or prospective client's evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 - Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations to disclose other than what is noted below. Adam Moroni Dawson is a licensed insurance producer through various insurance companies. In such capacity, he may offer insurance products and receive normal and customary commissions resulting from such purchases. In some cases, the firm may receive a portion of the commissions paid directly to him.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct which we require of our employees, including compliance with applicable federal securities laws.

Capstone Capital Wealth Advisors and our personnel owe a duty of loyalty, fairness, and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by sending an email to service@capstonecap.com, or by calling us at 702-433-7588.

Capstone Capital Wealth Advisors does not recommend to its clients' securities in which the firm or a related person has a material financial interest.

Capstone Capital Wealth Advisors or persons associated with the firm may buy or sell the same securities that the firm recommends to clients or securities in which clients are already invested. A conflict of interest may exist in such cases because Capstone Capital Wealth Advisors can trade ahead of the client and potentially receive more favorable prices than the client will receive. To eliminate this conflict of interest, it is Capstone Capital Wealth Advisors' policy that neither the firm's access persons nor Capstone Capital Wealth Advisors shall have priority over a client's purchase or sale of securities. The firm maintains a list of all reportable securities holdings for our firm, and anyone associated with Capstone Capital Wealth Advisors that has access to advisory recommendations ("access person") and these holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or their designee.

Item 12 - Brokerage Practices

In the event that the client requests that we recommend a broker dealer/custodian for execution and/or custodial services, the firm generally recommends that investment management accounts be maintained at Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer and member of SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Schwab is independently owned and operated and not affiliated with the firm. Schwab does not supervise or otherwise monitor the firm's investment management services to its clients. Schwab provides us with access to institutional trading and custody services, which typically are not available to Schwab's retail investors. Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Factors that we consider in recommending Schwab or any other broker-dealer/custodian to clients include financial strength, reputation, execution capabilities, pricing, research, and service. Although the transaction fees paid by our clients shall comply with our duty to obtain best execution, a client may pay a fee that is higher than another qualified broker-dealer might charge to effect the same transaction. The firm, in good faith, believes that the transaction fees charged are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services, including the value of research provided, execution capability, fee rates, and responsiveness. Accordingly, although we will seek competitive rates, we may not necessarily obtain the lowest possible fee rates for client account transactions. The brokerage transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, the firm's investment management fee.

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, the firm may receive from Schwab (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products which assist us to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the firm may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by us in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist the firm in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the firm to manage and further develop its business enterprise.

Our clients do not pay more for investment transactions effected and/or assets maintained at Schwab because of this arrangement. There is no corresponding commitment made by us to Schwab or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as result of the above arrangement.

The firm's Chief Compliance Officer is available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

The firm does not receive referrals from broker-dealers; nor engage in directed brokerage arrangements.

To the extent that the firm provides investment management services to its clients, the transactions for each client account generally will be affected independently, unless the firm decides to purchase or sell the same securities for several clients at approximately the same time. The firm may, (but is not obligated to), combine or "bunch" such orders to obtain best execution, to negotiate more favorable fee rates, or to allocate equitably among the firm's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. We shall not receive any additional compensation or remuneration resulting from such aggregation.

Schwab provides clients with consolidated statements. Our employees are not registered representatives of Schwab and do not receive any commissions or fees from recommending these services.

Item 13 - Review of Accounts

INDIVIDUAL PORTFOLIO MANAGEMENT REVIEWS

While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by Ronald K. Leavitt / Principal and Adam M. Dawson / Principal. In addition to the statements and confirmations of transactions clients receive from their custodian at least quarterly, we provide quarterly statements summarizing account performance, balances, and holdings.

Item 14 - Client Referrals and Other Compensation

Our firm may pay referral fees to independent persons or firms for introducing clients to

us. Under the agreement between the firm and the referring person or firm, we will compensate them with a portion of our advisory fee for persons referred to us who become a client. We maintain this arrangement in accordance with applicable state and federal laws.

As a matter of firm practice, the advisory fees paid to us by clients referred to us under these arrangements are not increased because of the referral arrangement.

Item 15 – Custody

Capstone Capital Wealth Advisors does not accept or maintain physical custody of any client cash or securities. All clients' assets are held by an independent qualified custodian. Capstone Capital Wealth Advisors will only have custody of assets to the extent it deducts its advisory fees from client accounts and in the use of Standing Letters of Authorization (SLOA's) for third-party money movement. As previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure, clients give Capstone Capital Wealth Advisors the authorization to directly deduct the firm's fee from their account held by the independent custodian. As part of this billing process, the client's custodian is advised by Capstone Capital Wealth Advisors of the amount of the fee to be deducted from the client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period, including the deduction of Capstone Capital Wealth Advisors' fee.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe there may be an error in their statement.

For SLOA's: All transfers from client custodial accounts to third party accounts will be preceded or accompanied by client written authorization. Capstone Capital Wealth Advisors will ensure that the SLOA will satisfy the requirements needed to avoid the need for the surprise annual audit for third-party money transfers and will contain the specific information needed to avoid custody when using a SLOA for a first-party money transfer.

Account Statements

Clients will receive at least quarterly account statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets detailing the assets in the account and any transactions including fee deductions.

Performance Reports

In addition to the account statements the clients receive directly from their custodians, we also send reports directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure all account transactions, holdings and values are correct and current. If you are not receiving at

least quarterly custodial account statements, please contact us at the number on the cover page of this brochure.

Item 16 - Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting them prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell and process the order.

Clients give us discretionary authority when they sign a discretionary agreement on the new account document and in the Investment Management Agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Capstone Capital Wealth Advisors requires it be provided with written authority to determine which securities and the amounts of securities that are bought or sold in a client's account.

Item 17 - Voting Client Securities

Capstone Capital Wealth Advisors does not vote proxies on securities or provide advice about how to vote proxies for securities held in client portfolios. Clients retain the responsibility for receiving and voting proxies for all securities maintained in their accounts. Clients should receive proxies or other similar solicitations directly from the client's selected custodian or transfer agent. Should we receive a duplicate copy, we generally do not forward it to the Client. Capstone Capital Wealth Advisors will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise, or monitor class action or other litigation involving client assets. Further, we will not offer or provide guidance on these matters; clients should contact the issuer or their legal counsel.

For some accounts established prior to October 2023, Capstone Capital Wealth Advisors has responsibility for voting proxies for portfolio securities consistent with the best economic interests of the clients. Clients can request information about how securities were voted by contacting the firm, and, in response, we will provide a written response to the client with the information requested.

Item 18 - Financial Information

Capstone Capital Wealth Advisors does not require or solicit pre-payment of fees more than \$1,200 per client, for services to be provided six months or more in advance. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts or is deemed to have custody, we are also required to disclose any financial condition reasonably likely to impair our ability to meet our contractual obligations. Capstone Capital Wealth Advisors has no additional financial circumstances to report.

Capstone Capital Wealth Advisors has not been the subject of a bankruptcy petition within the past ten years.