

Douglas Capital Management

Form ADV Part 3- Client Relationship Summary

March 1, 2021

Item 1: Introduction

Douglas Capital Management is registered with the Securities and Exchange Commission (SEC) as an investment advisor. We are not a broker-dealer. Please be aware that brokerage and advisory services and fees differ, and it is important for the retail investor to know the difference. Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS, which provides educational materials about broker-dealers, investment advisors and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. The firm's principal service is the management of investment portfolios- specifically Domestic Equity, Balanced and Intermediate Fixed Income Portfolios. Our investment advisory agreement executed with the client appoints Douglas Capital Management as a fiduciary with discretion over suitable investments within the guidelines established jointly with the client. Clients may impose restrictions on investing in certain securities or types of securities. Douglas Capital Management is retained on a discretionary basis and is authorized to buy and sell securities at its own discretion within the guidelines of each client's investment objective. Some clients limit the discretionary authority in terms of the type or amount of securities to be bought, the maximum concentration in any one company or industry, the minimum credit quality or maximum maturities for fixed income securities. For the most part, Douglas Capital Management has full authority to buy and sell securities and for the placement of its portfolio business and the amount of commissions paid on transaction. Our asset management services are individualized and are provided to employee benefit plans, individual retirement accounts, corporations, trusts, estates, institutions and high net-worth individual accounts. Each account is separate from all others, with no commingling of assets.

As part of our investment advisory agreement with each client, we jointly develop an investment policy guideline statement covering asset allocation, risk-tolerance, investment limitations, as well as current income needs and anticipated cash distributions. Each account is reviewed for proper asset allocation, cash flow, equity and fixed income performance at a minimum weekly. In addition, the price and trading volume of each security owned is monitored daily. Clients are provided quarterly reports which detail portfolio holdings, income/expenses, time-weighted returns and realized gains/losses. Please request our **Form ADV Part 2** for more complete information.

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

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

What fees will I pay?

Our fees are based on a percentage of the market value of your account, billed quarterly in advance. The annual fee is negotiable and is part of the investment advisory agreement. You may incur additional custodial fees,

brokerage fees and other transaction costs such as exchange fees, SEC fees, transfer taxes, electronic fund fees, wire transfer fees, and other related costs and expenses which are incurred by the client from custodians or brokers.

You will pay these fees 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. The more assets there are in a retail investors account, the more a retail investor will pay in fees, and we have an incentive to encourage the retail investor to increase the assets in his or her account.

Questions to ask: “Help me understand how these fees and costs might affect my investments. If I give you \$100,000 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 does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, we are required to act in your best interest, and not put our interest ahead of yours. At the same time, the way we make money may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

An example to help you understand what acting in your best interest may mean:

Douglas Capital Management will frequently aggregate its “fully discretionary” clients’ buy and sell orders into block trades whenever it deems it the most appropriate method for best execution. If trades are executed at different prices, Douglas Capital Management employs the average pricing technique to ensure equitable treatment for all clients. Douglas Capital Management’s proprietary portfolios may participate in the average pricing, but they will not receive a better price.

Questions to ask: “How might your conflicts of interest affect me, and how will you address them?”

How do your financial professionals make money?

All employees of the firm receive salaries. Neither the firm or any employee receives commissions, gifts, or incentives for investments made in client accounts

Item 4: Disciplinary History

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

Douglas Capital Management has not been subject to any disciplinary events, nor is it party to any legal events material to client evaluation of our advisory business. Please visit www.invest.gov/CRS for free and simple search tools to research us and our financial professionals.

Questions to ask: “As a financial professional, do you have any disciplinary history? For what type of conduct?”

Item 5: Additional Information

Investors may find further information regarding our investment advisory services by calling **(904) 285-7866** or emailing jad@douglascapital.net to request a copy of our most recent **Form ADV Part 2** and **relationship summary**.

Questions to ask? Who is my primary contact? Is he or she a representative of an investment adviser or broker dealer? Who can I talk with if I have concerns about how this person is treating me?