

Bolan Capital Management  
Form ADV Part 3, May 1, 2020

**Introduction**

Our firm, Bolan Capital Management (“BCM”), is registered with the SEC as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for a retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at the SEC’s investor education website, [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**What investment services and advice can you provide me?**

We offer investment advisory services to retail investors, including general investing portfolio management, retirement income planning, savings strategies, debt reduction strategies, and life insurance review services. We will discuss your investment goals and design with you a strategy to help you achieve your investment goals. We will monitor your account on a quarterly basis, and we will contact you at least annually to review previous services or recommendations and to discuss the impact resulting from any changes in the client’s financial situation or investment objectives. Such monitoring is part of our standard services.

Your contract with us gives us discretionary authority when managing your account, which, while you maintain your account with us, allows us to buy and sell investments in your account without asking you in advance.

We only offer advice with respect to equities (e.g., domestic and foreign stocks), debt (e.g., CDs and municipal bonds), investment company securities (e.g., mutual funds, money market funds, variable life contracts, and variable annuities). We do not require our clients to open an account with a minimum investment amount, nor do we require our clients to maintain a minimum account balance. We do, however, impose a minimum fee as discussed below.

**For additional information**, please see our Form ADV Part 2A brochure, specifically Items 4 and 7, for more detailed information about the services we offer.

**Conversation Starters.** Follow-up questions to ask your financial professional-

- **Given my financial situation, 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?**

**What fees will I pay?**

Fees and costs affect the value of your account over time. If you open an advisory account, you will pay an ongoing asset-based fee, assessed on a quarterly basis in arrears. Our fee schedule is below.

***Portfolio Value Annual Fee***

Assets up to \$500,000.....	0.95%
Next \$500,000 in assets (up to \$1.0 million).....	0.76%
Next \$500,000 in assets (up to \$1.5 million).....	0.57%
Next \$500,000 in assets (up to \$2.0 million).....	0.38%
Assets over \$2.0 million.....	negotiable

\*BCM imposes a minimum annual fee of \$1,500 per year for all accounts with less than \$150,000 in assets.

The more assets you have in the advisory account the more you will pay us. As a result, while we may have an incentive to recommend that you increase the assets in your account, we would only recommend additional investment if we believed it was in your best interest to do so in light of your particular objectives and financial situation. In addition to our firm’s management fee, there are other fees and costs related to our investment advisory services and investments

that you will pay directly or indirectly, such as brokerage commissions, transaction fees, charges imposed directly by a mutual fund or exchange-traded fund in the client's account, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Please ask questions to make sure you understand what fees and costs you are paying.

**For additional information,** please see Item 5 of our Form ADV, Part 2A.

**Conversation Starter.** Ask your financial professional-

- **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.*

Here is an example to help you understand what this means. BCM and/or their principals may offer to sell you life or health insurance products to its clients. BCM may receive compensation, including commissions, from the insurance companies associated with these transactions. BCM only recommends insurance products or other services when BCM believes it is in the best interests of the clients to do so.

**For additional information,** please see Item 10 of our Form ADV, Part 2A.

**Conversation Starter.** Ask your financial professional-

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

**How do your financial professionals make money?**

Our financial professionals are compensated via a salary and bonus and such compensation is based on factors such as service levels, assets gathered, and client satisfaction. BCM's President is compensated from the overall revenue collected by the firm. Other than as described herein, these payments to our financial professionals do not create any additional conflicts of interest.

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

No. You can visit [Investor.gov](http://Investor.gov) for a free and simple search tool to research our firm and our financial professionals.

**Conversation Starter.** Ask your financial professional-

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

**Additional Information**

We encourage you to seek out additional information.

For additional information on our advisory services, see our Form ADV brochure on IAPD, on [investor.gov](http://investor.gov), or on our website [www.bolancapital.com](http://www.bolancapital.com) and any brochure supplement our financial professional provides. To request up-to-date information or a copy of the relationship summary please call us at (513) 624-7070.

**Conversation Starter.** Ask your financial professional-

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