POINTE CAPITAL MANAGEMENT LLC

CLIENT RELATIONSHIP SUMMARY INTRODUCTION

POINTE CAPITAL MANAGEMENT LLC (PCM) is a fee-only Investment Adviser registered with the Securities and Exchange Commission (SEC). Investment advisory services and fees differ from those of a broker-dealer, and it is important for retail investors to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

Description of Services

PCM provides fee-only investment management services and is a fiduciary to each client. Item 4B, Form ADV 2A Brochure. We are available to provide services to individuals, pension and profit-sharing plans, 401(k) plans, trusts, estates, charitable organizations, institutional clients, state or municipal government entities, and corporations or other businesses. This summary briefly describes our services and fees. You should carefully consider which services are right for you and be sure to read our Form ADV 2 Brochures.

Investment Management Services are ongoing in nature and focus solely on portfolio management. We engage in a data gathering and discovery process to determine our client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, depending upon the services requested. We provide individualized services tailored to meet our clients' stated needs and objectives. Once the portfolio has been implemented or transferred for services, PCM will provide continuous monitoring, advice, and recommendations. Item 4.B(1), Form ADV 2A Brochure. For information about our investment adviser representatives and their professional designations, please review their Form ADV 2B Brochures.

Conversation Starters:

Questions to ask a financial professional and start a conversation about relationships and serves

Monitoring: Investment Management involves continuous and ongoing services with frequent monitoring of underlying portfolio assets (generally daily) and at a minimum, quarterly internal portfolio reviews. The frequency of and processes for reviews are dependent upon the nature and complexity of the portfolio, underlying assets, individual circumstances as reasonably known by PCM, and market conditions. We conduct client reviews at least annually during which time, we prompt clients to review their personal profile and financial information to ensure all data remains current. However, we encourage frequent communications and clients may call us any time during business hours. Clients are obligated to promptly contact PCM when there exists a real or potential change in their financial condition to give us an opportunity to review the data to help ensure the designated strategies continue to be appropriate. Item 13, Form ADV 2A.

Given my financial situation, should I choose an investment advisory service? Why or why not?

Investment Authority: With our client's authorization as provided in custodial account forms and our investment management agreement, PCM will maintain limited discretionary trading authority to execute securities transactions in a managed portfolio within the client's designed investment objectives. Clients are welcome to set written parameters on trading authority as to types and amounts purchased or sold. Non-discretionary services are available whereby the client retains authority to direct transactions. Item 16, Form ADV 2A.

Advice and Investments/Limited Offerings: As an independent Investment Adviser, PCM is not limited as to types of investments and does not offer proprietary products. We seek to allocate assets among various investments, taking into consideration the overall management style and portfolio design selected by our client. Recommendations associated with assets in retirement plans are limited to those offered within the plan and the contracted service provider. Item 4B, Form ADV 2A Brochure

How will you choose investments to recommend to me?

Account Minimums and Other Requirements: PCM desires a $1 million minimum relationship for investment management services. At our discretion, the minimum may be waived where special circumstances exist such as: prospective clients with the ability to meet the minimum within a reasonable time period; where future assets may be transferred to meet the minimum; pre-existing relationships, and family members of PCM's personnel. Item 7, Form ADV 2A.

Additional Information: PCM's Items 4,7,5 & 11, Form ADV 2A provides details relating to important service and fee information as well as our fiduciary responsibilities in compliance with the SEC's Regulation Best Interest. **Our investment adviser representatives' education, experience, industry designations and certifications** are discussed in PCM's Form ADV 2B Brochures.

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FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

CONVERSATION STARTERS:

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

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?

As a financial professional, do you have any legal or disciplinary history?

If yes, for what type of issue or conduct?

DISCIPLINARY HISTORY

ADDITIONAL INFORMATION

What fees will I pay?

Description of Principal Fees and Costs. PCM's annual **Investment Management** fee ranges up to 1% and is billed quarterly, in advance. We may modify our fee based on certain criteria. We may aggregate accounts or the portfolios of family members to take advantage of a lower billing rate based on reaching the next breakpoint. If assets are deposited or withdrawn after the inception of a quarter, the fee may be adjusted or prorated based on the number of days remaining in the quarter as set forth in PCM's client agreement. Fees may be higher than what other advisers charge for similar services. Item 5, Form ADV 2A.

What are your legal obligations to me when acting as my investment adviser?

Standards of Conduct. PCM is a fiduciary to each client. ***When we act as your investment adviser, we have to act in your best interest and not put our interests 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 advice we provide. For example, as a fee-only investment adviser, we are only compensated by fees paid by our clients. We are likely to recommend our services and during our relationship, we may recommend that you add funds to your managed portfolio. As assets increase, our compensation increases. However, PCM acknowledges its fiduciary duty and strives to provide advice that is suitable based on data you have provided to PCM. We may also recommend our preferred unaffiliated custodians with whom we have established a service relationship. Item 12, Form ADV 2A.

What conflicts of interest do you have? How does your firm make money?

Compensation and Conflict of Interest. As a fee-only investment adviser, PCM is only compensated by fees paid by our clients. We are likely to recommend our services and during our relationship, we may recommend that you add funds to your managed portfolio. As assets increase, our compensation increases. However, PCM acknowledges its fiduciary duty and provides advice that is suitable based on data you have provided to PCM. We may also recommend our preferred unaffiliated custodians with whom we have established a service relationship. Item 12, Form ADV, Part 2A Brochure.

How do your financial professionals make money? PCM's investment adviser representatives only earn a portion of the fees earned by PCM for providing services to our clients. **Other Business Activities:** PCM is solely engaged in providing investment advisory services. Our financial professionals do not accept commissions for the recommendation of securities or insurance sales.

Description of Other Fees and Costs. Investors are responsible for third-party fees associated with financial and investing activities and these vary depending on the services utilized, investments, and other factors. Clients pay transaction fees and brokerage commissions to their brokerage firm, and fees associated with their particular accounts (e.g., transfer fees, termination costs, wire transfer fees, retirement plan and/or trust fees, deferred sales charges, odd lot differentials, and other fees and taxes associated with investing). Fees and expenses charged to shareholders of exchange-traded and mutual funds are exclusive of and in addition to PCM's fees. Please read all securities offering documents. We do not receive any portion of these investment-related fees. 5.C, Form ADV 2A. **Important:** *You pay fees and costs whether you make or lose money on your investments, and these reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*

Do you or your financial professional have a legal or disciplinary history?

Yes. A free and simple search tool is available at investor.gov/CRS if you would like to search our firm or our registered personnel.

Additional information about our firm is available via the SEC's website https://adviserinfo.sec.gov/firm/summary/110799.
Jeffrey Huebner, CFA® is PCM's Managing Member. You may contact PCM at (313) 882-7100 or via email to jeff@pointecapital.com.
Colin Darke serves as PCM's Chief Compliance Officer. You may contact Mr. Darke at (313) 617-4473 or via email to colindarke@complisun.com.

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