



CAPITAL MANAGEMENT  
Advisor Group, LLC

## Form CRS – Client Relationship Summary

March 2023

### INTRODUCTION

Our firm, Capital Management Advisor Group, LLC, is an investment adviser registered with the Securities and Exchange Commission. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We are a registered investment adviser that offers investment advisory services to retail investors for an ongoing asset-based fee. Our advisory services include Wrap Comprehensive Portfolio Management, Comprehensive Portfolio Management and Financial Planning & Consulting. If you open an advisory account with our firm, we'll meet with you to understand your current financial situation, existing resources, goals, and risk tolerance. Based on what we learn, we will typically create a written financial plan before recommending a portfolio of investments that is regularly monitored, and if necessary, rebalanced to meet your changing needs, stated goals and objectives. We'll offer you advice on a regular basis and contact you at least annually to discuss your portfolio. Beyond our initial financial plan creation fee, financial planning is included in our Wrap Comprehensive Portfolio Management services for no additional fee. Financial Planning & Consulting is also offered as a separate service for an additional flat or hourly fee. We do not monitor your investments for the Financial Planning & Consulting service.

You can select in our agreement whether we are allowed to buy and sell investments in your account without asking you in advance ("discretion") or only buy and sell investments in your account after receiving your permission ("non-discretion"). If you select non-discretion, you make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. We will have discretion or non-discretion until the advisory agreement is terminated by you or our firm.

We do not restrict our advice to limited types of products or investments.

Our firm requires a minimum account balance of \$1,000,000 to open and maintain an account for our Wrap Comprehensive Portfolio Management service. This minimum account balance requirement is generally not negotiable and would be required throughout the course of your relationship with our firm. Exceptions will be made on a case-by-case basis.

*Additional information about our advisory services is located in Item 4 of our Firm Brochure and Item 5 of our Wrap Brochure, which are available online at <https://adviserinfo.sec.gov/firm/brochure/304617>.*

**Questions to Ask Us:** 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 those qualifications mean?

### WHAT FEES WILL I PAY?

You will be charged an ongoing annual fee applied quarterly fee based on the value of the investments in your account. Our maximum annual fee is 1.50% though our typical annual fee is 1.00%. The more assets you have in your advisory account, the more you will pay us. We therefore have an incentive to increase the assets in your advisory account in order to increase our fees. Our fees vary and are not negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. Our firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account. Our firm does not offer direct invoicing.

Our maximum flat fee is \$10,000 and our maximum hourly rate is \$500 for our Financial Planning & Consulting service. The fee paying arrangements are determined on a case-by-case basis.

The custodian that holds your assets charges a transaction fee when we buy or sell an investment for you. We pay the custodian's transaction fees charged to you for our Wrap Comprehensive Portfolio Management service. For our Comprehensive Portfolio Monitoring service, you would be responsible for transaction charges, but such

charges are not assessed by Capital Group, which is the only place that we establish non-wrap accounts. You may also pay charges imposed by the custodian holding your accounts for certain investments and maintaining your account. Some investments, such as mutual funds, index funds, exchange traded funds, and variable annuities, charge additional fees that will reduce the value of your investments over time. In addition, you may have to pay fees such as “surrender charges” to sell variable annuities.

In certain cases, we may refer you to separate account managers who will assist us with managing your account. If selected, they will charge you an additional fee, which will be described to you in their Form ADV and/or agreement.

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.

*Additional information about our fees is located in Item 5 of our Firm Brochure and Item 4 of our Wrap Brochure, which are available online at <https://adviserinfo.sec.gov/firm/brochure/304617>.*

**Questions to Ask Us:** Help me understand how these fees and costs may 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 are some examples to help you understand what this means:*

Timothy Menez is a licensed insurance agent. As such, he may offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest exists as these insurance sales create an incentive to recommend insurance products based on the compensation that he may earn. However, it is our commitment to always act in your best interest in relation to these types of sales.

For our wrap service, we pay the custodian’s transaction fees charged to you for most types of assets except for U.S. listed equities and exchange traded funds (ETFs). As a result, we have an incentive to limit trading and recommend U.S. listed equities and ETFs in order to reduce the amount of the custodian’s transaction fees that we will have to pay on your behalf. However, it is our ongoing commitment to act in your best interest in relation to trading activity.

*Additional information about our conflicts of interest is located in Item 10 of our Firm Brochure and Item 9 of our Wrap Brochure, which are available online at <https://adviserinfo.sec.gov/firm/brochure/304617>.*

**Questions to Ask Us:** 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 based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, and the time and complexity required to meet a client’s needs.

#### DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. Visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Questions to Ask Us:** As a financial professional, do you have any disciplinary history? For what type of conduct?

#### ADDITIONAL INFORMATION

You can find additional information about our firm’s investment advisory services on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #304617. You may also contact our firm at 925-935-8200 to request a copy of this relationship summary and other up-to-date information.

**Questions to Ask Us:** 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?