

ITEM 1 – INTRODUCTION

Strathmore Capital Advisors, Inc. (“Strathmore”) is an SEC-registered investment adviser that provides advisory services. This document is a summary of the types of services we provide and how you pay for these services. For additional information and tools to research firms and financial professionals, please visit <https://www.investor.gov/CRS>. You can also find educational materials about broker-dealers, investments advisers and investing at this site. We have also included sample key questions to ask in this document.

ITEM 2 – RELATIONSHIP SERVICES

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. As part of these services, we offer portfolio management and retirement plan consulting to our clients.

As part of its services, Strathmore’s portfolio managers review with each client their investment goals and objectives on an annual basis. The Strathmore investment team reviews each investment strategy regularly. The precise frequency of these meetings will vary in response to market conditions, but investment strategies are reviewed no less frequently than annually.

Strathmore provides advisory services to you on a discretionary basis. This means that Strathmore has the authority to determine, without obtaining client consent, the securities to be bought or sold and the amount of securities to be bought or sold in your account. In all cases, however, such discretion is exercised consistent with the stated investment objectives as part of your investment advisory Agreement with Strathmore. Any stated investment objectives, guidelines, limitations, or restrictions you impose on the accounts will be documented as part of the account opening process and/or indicated in our Agreement.

Strathmore manages investment portfolios that primarily invest in mutual funds, ETFs, and other pooled investment vehicles. The investment strategy for a specific client is based upon a client’s objectives and risk profile, which are discussed with you during initial and subsequent client meetings.

Strathmore does not generally impose a minimum portfolio value or charge a set minimum fee for its conventional advisory services. For additional information, see Item 4 – Advisory Business (pages 4-6) of Strathmore’s ADV Part 2A (Brochure), which can be [accessed here](#).

Key questions to ask:

- 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?

ITEM 3 – FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay?

Strathmore charges an asset-based management fee for its advisory services. You pay this fee whether you make or lose money on your investments. These fees are negotiable. Strathmore prefers to bill management fees in advance and on a quarterly basis. The advisory fee does not include fees related to brokerage commissions, transaction fees, and other related account costs and expenses including custodial fees, transfer taxes, wire transfer and electronic fund fees, and other taxes and fees. Strathmore’s advisory fees are asset-based. Thus, the more assets there are in

your advisory account, the more you will pay in fees. As a result, the firm may have an incentive to encourage you to increase the assets in your account. Strathmore typically deducts your management fee from your account each quarter. Other fees and costs are also deducted from your account and will appear on your quarterly statement that you receive from your broker and/or custodian bank. 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. For additional information, please see Item 5: Fees and Compensation in Strathmore's Form ADV Part 2A, [accessible here](#).

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? 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 that we provide you. Here is one example to help you understand what this means. Strathmore uses large retail broker-dealers to execute trades in your account(s). As part of our arrangement with large broker-dealers, they provide our investment professionals access to products and services that assist us in managing and administering your account(s). This includes software and technology that provides access to your account and assists with back-office functions, recordkeeping, and client reporting. Thus, a conflict exists, as Strathmore has an incentive to select a broker-dealer based on our interest in receiving the research or other products or services, rather than on the clients' interest in receiving lower fees and commissions through another broker-dealer. A more detailed explanation of these benefits is included in our ADV Part 2A, Item 12: Brokerage Practices, [accessible here](#).

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

How do your financial professionals make money?

Our financial professionals may be compensated in one or more ways, including fixed salaries, a fixed percentage of fees from the client accounts they service, or some combination of the two. This compensation is based on numerous factors, such as the revenue generated by the clients each advisor serves, the number of portfolios overseen by the individual, and the general performance of client accounts relative to overall market conditions. These factors may vary, but none of our advisors' compensation is tied solely to the investment performance of a client's account. Nevertheless, this compensation structure creates an incentive for our advisors to recommend that you increase the size of your account with us.

ITEM 4 – DISCIPLINARY HISTORY

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

No. A free and simple search tool to research us and our financial professionals is available at <https://www.investor.gov/CRS>.

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

Additional information about our investment advisory services and an up-to-date copy of the relationship summary is available by contacting us at (704) 364-4241 or contacting the Chief Compliance Officer at tcf@strathmorecapadv.com.