

Corbett Road Capital Management, LLC
Form CRS: Client Relationship Summary
July 28, 2023

INTRODUCTION

Corbett Road Capital Management, LLC (referred to here as “us,” “we,” “our firm” or “CRCM”), is providing this **Customer Relationship Summary** as part of Regulation Best Interest. We are registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ therefore it is important for you to understand the differences between these types of accounts.

Throughout this summary we have provided some “conversation starters” which you may wish to discuss with us as a way to get to know us better.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://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 provide continuous investment advice and supervision of the model portfolios we offer. CRCM offers both investment advisory and sub-advisory services to institutionally oriented accounts, which include accounts with financial advisory firms as well as clients who open an account with \$20 million or more in assets with the Firm.

For advisory services, clients work directly with an IAR of the Firm who believes that an investment in CRCM’s strategies is in your best interest and is suitable for your needs and investment objectives. Our recommendations are subject to any restrictions you may place on us. Generally, we do not limit the types of products available to you, but we will, subject to your consent within our advisory agreement, use proprietary products in certain accounts.

CRCM also serves as a sub-advisor to an ETF based on our Opportunity portfolio strategy. We will sometimes use this ETF in client accounts for purposes of diversification or tax efficiency when we believe it is in the best interest of our clients. This will only be done in accordance with your wishes as they are outlined in your investment management agreement.

Advisory agreements are between CRCM and the client. CRCM requires discretion over your investments, which means that we will not contact you or your Adviser for permission to place trades in your account. On a quarterly basis, account statements are provided for your investments with our firm. We actively monitor your investments on a daily basis.

More information about our services can be found in Item 4 of our Form ADV Part 2A brochure, which is available at <https://adviserinfo.sec.gov/firm/summary/305063>

CONVERSATION STARTERS:

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 experience, including your licenses, education, and other qualifications?

What do these qualifications mean?

WHAT FEES WILL I PAY?

Our firm charges asset-based advisory fees for managing your investments. Our asset-based fees are based on the value of your account. This fee is outlined in the investment agreement you signed. This fee is charged monthly in arrears and is based on the custodian’s market value of your account.

You will usually also pay fees to the custodian where your assets are held. These fees include transaction, processing, and other costs related to maintaining your account. There are also transaction and management fees charged by the companies which sponsor mutual funds, ETFs, and annuities which we purchase for you. We do not receive or benefit from these custodial or outside manager fees unless we are the manager of an ETF purchased for you.

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. For more information on our fees, see Item 5 of our Form ADV Part 2A, which can be found at <https://adviserinfo.sec.gov/firm/summary/305063>

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	<p style="text-align: right;"><u>Conversation Starters:</u></p> <p style="text-align: center;"><i>Help me understand how these fees and costs might affect my investments. If I give you \$10,000, how much will go to fees and costs and how much will be invested? How might your conflicts of interest affect me and how will you address them?</i></p>
<p>WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS?</p> <p>HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?</p>	<p>When we act as your investment advisor, 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 with. Here are some examples to help you understand what this means:</p> <ul style="list-style-type: none"> • We manage an ETF which we sometimes use in client accounts when we believe there are benefits to the client. We have financial and other incentives to choose this ETF over other products, which creates a conflict. • We are affiliated by ownership with Spire Securities, LLC and Spire Wealth Management, LLC, a broker/dealer, and registered investment adviser. Some of our personnel provide services to these firms, often using similar strategies. These services compete for our time, which creates a conflict. Information about our affiliates can be found at www.spireip.com • We service clients who are introduced to us through an affiliate, which means we have an incentive to favor those clients. • We serve multiple clients across several platforms, some of which are more profitable than others. • We offer both advisory and sub-advisory investment account services. <p>In all these cases we disclose and, where possible, mitigate these conflicts by acting in what we believe is your best interest.</p> <p style="text-align: right;"><u>CONVERSATION STARTERS:</u></p> <p style="text-align: center;"><i>Procedures are in place to monitor recommendations that may not be in your best interest. How might your conflicts of interest affect me and how will you address them?</i></p>
<p>HOW DO CRCM FINANCIAL PROFESSIONALS MAKE MONEY?</p>	<p>Employees are paid a salary and are eligible to receive a discretionary quarterly bonus. While the bonus is discretionary, we try to focus on long-term goals in awarding it. This, we believe, helps to align our interests with yours.</p> <p style="text-align: right;"><u>CONVERSATION STARTERS:</u></p> <p style="text-align: center;"><i>If you are confused about the relationship between a financial professional's outside activity and our firm, please contact us immediately at (703) 748-5831.</i></p>
<p>DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?</p>	<p>Neither our firm nor our financial professionals have any legal or disciplinary histories. Please visit https://adviserinfo.sec.gov/ for a free and simple search tool to research our firm and our financial professionals.</p> <p style="text-align: right;"><u>CONVERSATION STARTERS:</u></p> <p style="text-align: center;"><i>Please explain your disclosure history to me. Please explain your firm's disclosure history to me.</i></p>
<p>ADDITIONAL INFORMATION</p>	<p>You can find additional information about our firm's investment advisory services as well as the firm's other business lines on the SEC's Investment Advisor Public Disclosure site at https://adviserinfo.sec.gov/firm/summary/305063. You may also visit our website at http://www.corbettroadcapital.com/ to request a obtain copy of this relationship summary and other up-to-date information. You can also contact us by phone at (703) 748-5831 to obtain an up-to-date, free of charge Customer Relationship Summary.</p> <p style="text-align: right;"><u>CONVERSATION STARTERS:</u></p> <p style="text-align: center;"><i>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?</i></p>