

**November 14, 2025**

Arsenal Capital Advisors LLC ("Arsenal Capital") is an SEC-registered investment adviser that provides investment advisory services. Brokerage and investment advisory services and fees differ, and it is important to understand the differences. Free and simple tools to research firms and investment professionals can be found at [Investor.gov/CRS](https://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 offer investment advisory services to retail investors. Our portfolio management services are based on the individual goals, objectives, time horizons, and risk tolerance levels of each client. Through personal discussions in which goals and objectives based on client's circumstances are established, Arsenal Capital establishes an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, investment strategy, personal investment policy, asset allocation, asset selection, risk tolerance, and regular portfolio monitoring.

Our services may be provided on either a discretionary or non-discretionary basis. When providing our services on a discretionary basis, we select investments and execute transactions without your consent. Even though we have discretion, you can, subject to our consent, impose reasonable restrictions on our authority to select certain investments. In a non-discretionary relationship, we may only trade securities in your account subject to your prior approval. This means that you make the ultimate decision regarding the purchase or sale of investments.

Our services are not limited to any particular investment products or securities.

There is an account minimum of \$1,000,000, which may be waived by Arsenal Capital. Additional information on our fees is provided below.

*For additional information on our services and types of clients, please see our Form ADV Part 2A Brochure, Items 4 and 7, which can be found at [arsenalcapitaladvisors.com](https://arsenalcapitaladvisors.com).*

**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 relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

**What fees will I pay?**

We generally charge an ongoing asset-based fee based on a percentage of the assets managed. We collect fees quarterly, in advance, based on your accounts closing market value for the current quarter. The more assets in your account, the more fees you will pay. This creates an incentive for us to encourage you to increase the assets in your account. Fees are tiered (decline as assets rise) but generally start at an annual rate of 1.00%. You may pay additional fees and costs related to our services. These include brokerage costs, custodial charges, maintenance fees, trading fees and other investment product expenses charged by unaffiliated third parties. Services and expenses vary by custodian so you may be able to secure similar, or additional, services at another custodian for the same, or lower, cost.

*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 additional information on our fees and compensation, billing practices, and other types of fees or expenses clients will pay in connection with our advisory services, please see item 5 of our form ADV Part 2A Brochure which is linked above.*

**Conversation Starter:** 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 are some examples to help you understand what this means. We receive, at no cost, services and software from our primary custodian, Charles Schwab, that helps us in managing client accounts. We receive these benefits for free so long as our clients maintain a certain aggregate level of assets with them. We therefore have an incentive to recommend Charles Schwab in order for us to maintain this benefit even though you may be able to get similar custodial services at other custodians for less cost.*

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

*For additional information about our conflicts of interest that can affect our advisory relationship with you, please see our Form ADV Part 2A Brochure which is linked above.*

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

Our financial professionals are compensated based on revenue generated through advisory fees. This compensation creates a conflict of interest because they have an incentive to increase assets under management through asset appreciation (by selecting riskier investments) or securing additional assets from you.

**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 [Investor.gov/CRS](https://www.investor.gov/crs).

**Conversation Starter:** As a financial professional, do you have any disciplinary history? For what type of conduct?

*Additional information about our investment advisory services and a copy of the relationship summary is available by contacting our Chief Compliance Officer Michael Mann at 484-367-3611.*

**Conversation Starter:** 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?