

## Introduction

Valor Capital Management, LLC (“Valor”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an Investment Adviser. Brokerage and investment advisory services and fees differ. It is important for a retail investor to understand the differences. There are free tools available for investors to research firms and financial professionals at [investor.gov/CRS](https://investor.gov/CRS). This site also provides educational materials about broker-dealers, investment advisers, and investing. Additional information about Valor can be found on our website. [Valor Capital Management](#)

## What investment services and advice can you provide to me?

Valor operates as a Turnkey Asset Manager Program (“TAMP”), Sub-advisor and/or Fund Strategist providing asset management and administrative services which are utilized by registered investment advisers, broker-dealers, and other financial institutions (collectively “Separate Advisors”) for the benefit of their retail investors through your separate advisor, Valor offers investment advisory services to retail investors. Valor offers model portfolios which your Separate Advisor can select to invest your assets. As part of Valor’s TAMP offering, Valor retains and provides access to certain third-party investment managers to design and manage model portfolios called separately managed accounts (“SMA’s”). The SMA manager, not Valor or the Separate Advisor, is responsible for all investment decisions and trade execution in the client accounts. In addition, Valor offers a platform where your Separate Advisor has the ability to build and manage one or more customized individual investment portfolio for their clients (“AdvisorSelect Portfolios”). Under this platform, Valor will execute trading as directed by your Separate Advisor. Your Separate Advisor is responsible for making suitable recommendations for you and monitoring your account. Valor acts with limited discretionary authority which is limited to managing and trading your assets in accordance with the strategy as directed by your Separate Advisor. This means that we will be authorized by you to execute investment transactions for your account(s) and buy and sell the securities as directed by your Separate Advisor with your funds from your account(s). Valor does require a minimum portfolio size of \$5,000-\$75,000 depending on the model selected; however, exceptions may be granted. Third-party investment managers may impose higher or lower minimums. Valor imposes a minimum \$150 per year annual fee billed on a quarterly basis to engage our services. For more detailed information about our services refer to our [FORM ADV 2A](#).

### CONVERSATION STARTERS

#### ASK YOUR FINANCIAL PROFESSIONAL:

- 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?

### Description of Principal Fees and Costs

Valor offers its services on fees charged based upon assets under management (“AUM”). Valor’s advisory fee and/or TAMP platform fee typically varies between 0.20% and 0.60% annually depending upon several factors, including the market value of the AUM and the types of services to be rendered. Additionally, your Separate Advisor typically will charge a fee, which is charged and collected by Valor from your account. The fees paid by clients include portions paid to your Separate Advisor, as well as to Valor. The AUM annual fee is prorated and charged quarterly, in advance. When you are charged an asset-based fee, the more assets there are in an investor’s advisory account, the more an investor will pay in fees, and the firm therefore has an incentive to encourage your separate advisor to increase the assets with Valor. Fund Strategist advisory fees are paid to Valor by the platform provider as agreed upon via the agreement entered into by Valor and the platform provider.

### Description of Other Fees and Costs

Other fees charged to you that are related to your account are fees paid to the custodian, fees related to mutual funds, sub-adviser, third-party manager, as well as other transactional and product-level fees.

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. The fees for investment advisory services are described in further detail in our ADV, in particular, Part 2A brochure, Items 5.A., B., C., D., and E.

### What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

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 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. Valor pays various forms of direct and indirect compensation to certain Separate Advisors, which take the form of marketing, administrative, service, conference sponsorships, sharing of advisory fee revenue, and fee reimbursements as well as education and training support that are available through Valor or its affiliate, Clarity 2 Prosperity. Since your Separate Advisor may not receive these direct and indirect financial benefits from other investment advisors and because the amount received may increase based on the level of business directed to Valor and its affiliates, your Separate Advisor has a financial incentive and conflict of interest to recommend Valor over other programs or services. Our custodians provide additional services to PCA in their sole discretion and at their own expense, and PCA does not pay any fees to the custodians for the additional services. For more detailed information regarding conflicts of interest, please see our [FORM ADV 2A](#)

### How do our financial professionals make money?

At Valor, our firm is paid a percentage of the client's AUM advisory and/or platform fee. Valor and its affiliates also offer eligible Separate Advisors additional financial benefits through the Enterprise Partner Program ("EPP"). Based on C2P Enterprises ("C2Pe") results, the EPP may award certain Separate Advisors who conduct all investment advisory and fixed insurance business with Valor and its applicable affiliates a pro-rata C2Pe equity grant. Valor may occasionally host an advisor conference where they offer non-cash compensation to your Separate Advisor based on the amount of new advisory business the Separate Advisor places with Valor. Additionally, Valor offers a revenue share program to the RIAs it partners with. Separate Advisors have a fiduciary duty to their clients which mitigates these compensation related conflicts of interests.

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

No. Please see [Investor.gov/CRS](http://Investor.gov/CRS) for a free search tool to research Valor.

Our telephone number is (440) 872-6559. Please call us for up-to-date information about our firm and to request a copy of our relationship summary.

#### CONVERSATION STARTERS

##### ASK YOUR FINANCIAL

##### PROFESSIONAL:

- 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?

#### CONVERSATION STARTERS

##### ASK YOUR FINANCIAL

##### PROFESSIONAL:

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

#### CONVERSATION STARTERS

##### ASK YOUR FINANCIAL

##### PROFESSIONAL:

- As a financial professional, do you have any disciplinary history? If so, for what type of conduct?
- Who is my primary contact person?
- Is he or she a representative of an investment adviser?
- Who can I talk to if I have concerns about how this person is treating me?