

### **Introduction**

Our firm, Miramontes Capital, 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 to retail clients include Wrap Comprehensive Portfolio Management and 529 account management. 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'll recommend a portfolio of investments that is monitored at least quarterly, 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 quarterly to discuss your portfolio.

Financial planning is included in our Comprehensive Portfolio Management and is also offered as a separate service for an additional flat and/or hourly fee.

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 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 \$75,000 to open and maintain an account for our Comprehensive Portfolio Management service.

*Additional information about our advisory services is located in Item 4 of our Wrap Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/264786>*

### **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 fees will I pay?**

You will be charged an ongoing monthly fee based on the value of the investments in your account. Our maximum annual fee is 2.25% for Wrap Comprehensive Portfolio Management services. The maximum fee for 529 account management services is 0.65%. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. 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 firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account. In rare cases, our firm will agree to send you invoices rather than automatically deduct our firm's fees from your advisory account.

The broker-dealer that holds your assets charges a transaction fee when we buy or sell certain investment products for you. We pay the broker-dealer's transaction fees charged to you for our Wrap Comprehensive Portfolio Management services. The fees for our wrap fee programs are therefore higher than a typical asset-based advisory fee. You may also pay charges imposed by the broker-dealer holding your accounts for certain investments and maintaining your account. Some investments, such as mutual funds, exchange traded funds, and variable annuities, charge additional fees that will reduce the value of your investments over time.

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.

We also employ Third Party Money Managers who help us manage some of our Client accounts. The Third Party Money Manager fee is included in our 2.25% maximum fee.

*Additional information about our fees is located in Item 4 of our Wrap Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/264786>.*

**Questions to Ask Us:**

- Help me understand how 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:*

Our firm's financial professionals are registered representatives of Balanced Security Planning, Inc. (BSP), an affiliated broker-dealer owned by Ariana Mangum and Isidro Miramontes, the principals of Miramontes Capital, LLC. As well as an unaffiliated Broker-Dealer, American Trust Investment Services, Inc. They charge a transaction-based fee, commonly referred to as a commission, each time they buy or sell a security in a brokerage account. As a result, they have an incentive to trade as much as possible in order to increase their compensation. For more information about BSP, please see BSP's form CRS.

Our firm's related persons also own All Inclusive Insurance, of which some of our IARs are also Insurance Agents. As such, they may offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation earned.

For our wrap service, we pay the broker-dealer's transaction fees charged to you for most types of assets except for U.S. listed equities and exchange traded funds. As a result, we have an incentive to recommend U.S. listed equities and exchange traded funds in order to reduce the amount of the broker-dealer's transaction fees that we will have to pay on your behalf.

*Additional information about our conflicts of interest is located in Item 9 of our Wrap Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/264786>.*

**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. Additionally, our representatives earn commissions when selling insurance or brokerage products to you through their affiliations with Balanced Security Planning, Inc. and American Trust Investment Services, Inc. and All Inclusive Insurance.

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

Yes, our financial professionals have legal and disciplinary history. Visit [Investor.gov/CRS](https://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 kind 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](https://www.adviserinfo.sec.gov) by searching CRD #265786. You may also contact our firm at 1-800-460-1595 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?