

**AMENDED**  
**Form CRS – Client Relationship Summary**  
**Spectrum Strategic Capital Management, LLC**  
**March 23, 2023**

Spectrum Strategic Capital Management (“SSCAPM”, “Firm”, “we”, “our”, or “us”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available for you 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?**

SSCAPM offers services to retail investors that fall into two broad categories: Investment Management and Financial Planning. Investment management services are available through managed account portfolios. We currently offer two investment strategies, the Investment Management Services Strategy and the Enhanced Index Strategy. Each strategy offers various investment objective allocation models. Portfolio construction is based on the asset allocation model that has been determined to be appropriate for you, based on your financial situation, investment objectives, time horizon, risk tolerance and investment preferences. Account portfolios usually consist of, but are not limited to, a combination of some or all of the following: money market funds, mutual funds, stocks, bonds, unit investment trusts, exchange traded funds (“ETFs”), certain limited private offerings (e.g., private funds), and certificates of deposit. When you have us manage your portfolio(s), you give us investment discretion over the assets in your account(s) through our client agreement. Having discretionary authority allows us to decide the type and amount of securities to be bought or sold for your account(s) and when to invest, without consulting you first. We maintain this discretion until it is revoked (e.g., by termination of our agreement or upon written instruction from you). We generally require an investment minimum of \$250,000 for accounts invested in the Investment Management Services Strategy and \$20,000 for accounts invested in the Enhanced Index Strategy. As part of our investment management services, managed accounts are reviewed on a continuous basis. Additional reviews can be triggered by a variety of factors, including but not limited to a change in your financial situation or a major change in the market.

Financial planning is available as a stand-alone service or as part of our investment management services. We prepare a written financial plan with recommendations addressing your specific planning needs. The plan can be comprehensive in nature or directed toward a specific goal such as education or retirement income planning. You retain the right to decide whether to act upon any of our recommendations and you are under no obligation to have any of our recommendations implemented by us. Should you choose to follow our recommendations and have us implement the plan, you should know that for certain recommendations we will receive fees, compensation, and/or other concessions, which represents a conflict of interest. Please refer to the section below on “How do your financial professionals make money”. *For further information about our services and advice please read Items 4, 7, and 8 of our Form ADV Part 2A disclosure brochure. Click [here](#) for a copy or call us at (503) 746-9666.* You also can visit our website where you can read about our investment management services.

**Conversation Starters - Ask one of our financial professionals the following questions:**

- ***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 licenses, education, and other qualifications? What do these qualifications mean?***

**What fees will I pay?**

For stand-alone financial planning, we bill at rates ranging from \$100 to \$425 per hour depending on whether the services are performed by a staff member or Firm partner or on a fixed-fee basis, as agreed upon with you. Our hourly fee is negotiable at our discretion, billed and payable upon our completion of the work. Should you decide at the beginning of the relationship to have us provide both financial planning and investment management services, the financial planning fees are waived. Our annual investment management fee for our Investment Management Services Strategy is 1.10% on assets between \$250,000 to \$1,000,000, 1.00% for assets between \$1,000,001 to \$2,000,000, 0.80% for assets between \$2,000,001 to \$3,000,000, 0.75% for assets between \$3,000,001 to \$5,000,000, and 0.65% for assets of \$5,000,001 or above. Our annual investment management fee for our Enhanced Index Strategy is 0.50% of assets. We calculate our management fee each quarter, *in advance*, based on the total market value of your assets under management as of the close of the last business day of the previous quarter. To calculate the tier breakpoints, we household (aggregate) your accounts, as defined in our client agreement. Additional deposits of cash and/or any securities will be subject to the same billing procedures. Currently, we do not prorate fees based on withdrawals. The total market value of your account(s) will include securities, cash/cash equivalents, and any margin balance. The latter creates a conflict of interest since this can result in our fee being higher. Our fees are negotiable and we do have clients with different fee structures.

Our management fee is separate from third-party fees associated with your managed account, which can include (as applicable), but not limited to, custodian fees, brokerage fees, transaction costs, wire transfer and electronic fund fees, transfer taxes, and retirement plan

administration fees. An account that is invested in mutual funds and ETFs will be subject to certain fees and expenses which are embedded in the price of the mutual fund or ETF. In addition, investments in private funds are subject to additional fees and expenses, including management fees charged by the adviser managing the assets of the private fund. You should carefully review all third-party fees, together with the fees we charge, to fully evaluate the advisory services being provided and the total fees being paid. 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 further information about our services and advice please read Items 5, 6, 10, and 14 of our Form ADV Part 2A disclosure brochure. Click [here](#) for a copy or call us at (503) 746-9666.*

**Conversation Starter - Ask one of our financial professionals the following questions:**

- ***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 must 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 that means: **Third Party Payments:** Spectrum receives certain products and services from an unaffiliated broker-dealer we recommend as custodian at no cost, which benefit us but do not benefit our clients. This creates a conflict of interest as it gives us an incentive to have our clients custody their assets at this broker-dealer. Also, our firm had an arrangement with a non-affiliated investment firm that pays us a referral fee. Even though we no longer recommend that firm, we still have clients for whom we receive a referral fee. **Proprietary Products:** Spectrum has an affiliated insurance agency and certain of our financial professionals are licensed insurance agents. When one of our financial professionals recommends insurance to you and you purchase such insurance, the financial professional will earn commission-based compensation. Our affiliated insurance agency will also receive compensation if you purchase the insurance through them. This creates a conflict of interest as it gives us an incentive to recommend insurance products to you. *More detailed information about our conflicts of interest can be found in Items 4, 10, 11, 12, and 14 of our Form ADV Part 2A disclosure brochure. Click [here](#) for a copy or call us at (503) 746-9666.**

**Conversation Starter - Ask one of our financial professionals the following question:**

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

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

We pay our financial professionals a salary and bonus. A portion of the bonus is a percentage of the fee we collect from you. This fee is paid solely from the investment advisory fee you pay and does not affect the amount of fee we charge you. Another component of the bonus is based on the performance of our strategies. In addition, some of our financial professionals are licensed insurance agents, and they earn commissions on insurance products they sell to you and other clients. Additional information about the compensation received by our financial professionals and any related conflicts of interest are outlined in each professional's Form ADV Part 2B, which can be obtained by calling us at (503) 746-9666.

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

No. Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for free and simple search tools to research our firm and our financial professionals.

**Conversation Starter - Ask one of our financial professionals the following questions:**

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

**Additional information**

You can obtain additional information and/or request a copy of this Form CRS by going to [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or by calling us at (503) 746-9666.

**Conversation Starter - Ask one of our financial professionals the following questions:**

- ***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?***

**EXHIBIT A**

**AMENDED  
FORM CRS**

**CLIENT RELATIONSHIP SUMMARY  
SPECTRUM STRATEGIC CAPITAL MANAGEMENT, LLC  
March 23, 2023**

**SUMMARY OF MATERIAL CHANGES**

**What fees will I pay?**

Updated to change the hourly rate of our financial planning fees.