

Form CRS – Client Relationship Summary
Spectrum Strategic Capital Management, LLC
September 26, 2025

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://www.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 advisory 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 three investment strategies, the Investment Management Services Strategy, the Enhanced Index Strategy, and the Unconstrained Alpha+ Strategy. Portfolio construction for the Investment Management Services Strategy and the Enhanced Index Strategy 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. The Unconstrained Alpha+ Strategy is a long-short growth strategy that is highly speculative, does not have any risk tolerance constraints and has restrictions on redemptions. Therefore, it is mainly only available to ultra-high net worth investors that meet the definition of “accredited investor” under SEC regulations.

Depending on the strategy, 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”) including cryptocurrency ETFs, certain limited private offerings (e.g., private funds), and certificates of deposit. Also, in certain cases we will utilize options and in the Unconstrained Alpha+ Strategy, we engage in short sales. 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, \$20,000 for accounts invested in the Enhanced Index Strategy, and \$100,000 for accounts invested in the Unconstrained Alpha+ 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 and Unconstrained Alpha+ Strategy is 0.50% and 1.25% of assets respectively. We calculate our management fee for the Investment Management Services Strategy and the Enhanced Index Strategy 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. Our management fee for the Unconstrained Alpha+ Strategy is calculated by Interactive Brokers LLC, the custodian for accounts in that strategy and charged in arrears based on the account’s total market value as of the close of the last

business day of the calendar quarter. Interactive Brokers LLC debits our fees from your account and pays us directly. To calculate the tier breakpoints for the Investment Management Services Strategy, 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 pro-rate fees based on withdrawals. The total market value of your account(s) will include securities, cash/cash equivalents, and for accounts invested in the Investment Management Services Strategy and the Enhanced Index Strategy, 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, margin interest, 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 question:

- ***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 the unaffiliated broker-dealers we recommend as custodians 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 with these broker-dealers. 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 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 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
FORM CRS
CLIENT RELATIONSHIP SUMMARY
SPECTRUM STRATEGIC CAPITAL MANAGEMENT, LLC
September 29, 2025
SUMMARY OF MATERIAL CHANGES

What investment services and advice can you provide me?

Updated to include disclosures: (i) regarding the Unconstrained Alpha+ Strategy, which is a new highly speculative long/short investment strategy we are offering to accredited ultra-high net worth investors, (ii) that we engage in short sales for the new strategy, and (iii) that, depending on the strategy, we utilize cryptocurrency ETFs.

What fees will I pay?

Updated to include disclosures: (i) on the investment management fee we charge for the Unconstrained Alpha+ Strategy, (ii) that the management fee for the Unconstrained Alpha+ Strategy is calculated in arrears by Interactive Brokers LLC, the custodian for accounts in that strategy, then debited from the clients' accounts and paid directly to Spectrum, and (iii) that margin interest is included in fees charged by third parties that are associated with managed accounts.