

**First Western Capital Management
Client Relationship Summary
June 30, 2020**

Introduction

First Western Capital Management (“FWCM”) is an investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker dealers, investment adviser, and investing.

What investment services and advice can you provide me?

We provide investment management services to our clients, typically managed on a discretionary basis using our proprietary investment strategies and our advice is limited to investments solely within those strategies (e.g. High Yield strategies only utilize high yield bond instruments). We may accept non-discretionary accounts on occasion, but that is by exception only. Our strategies and minimum account sizes include the following:

Strategy	Type of Strategy	Account Minimum(s)
California Tax Exempt	Fixed Income	\$500,000
Fixed Income (Core, Total Return, Unconstrained)	Fixed Income	Core-\$500,000 Total Return-\$1,000,000 Unconstrained-\$5,000,000
High Income	Fixed Income	\$500,000
High Yield Capital Appreciation	Fixed Income	\$500,000
National Tax Exempt	Fixed Income	\$500,000
Short Duration Fixed Income	Fixed Income	\$2,000,000
Equity Growth	Equities	\$150,000
Income Equity	Equities	\$150,000
Large Capitalization Core	Equities	\$150,000

All account minimums are negotiable and may be waived at our discretion. We provide both discretionary investment management services, in which case we place trades in a client's account without contacting the client to obtain their permission, and non-discretionary services, in which the portfolio manager will obtain client approval prior to implementing any recommended investment transactions. Accounts are monitored continuously by your strategy's portfolio manager. You may impose reasonable restrictions on management of your account(s), subject to our approval. For additional information, please refer to FWCM's ADV Part 2A, Items 4, 7, 8, and 13 on <https://adviserinfo.sec.gov/firm/brochure/152982>.

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?

You will be charged an **ongoing management fee based upon the assets under management** in accordance with the fee schedule contained in your investment advisory agreement. These fees are “asset-based” meaning that the fee is calculated as a percentage of the assets invested in your advisory account according to the fee schedule in your advisory agreement with us. This means that the more assets you invest in your account, the more you will pay in fees, and therefore **we have an incentive to encourage you to increase your advisory account assets**. Asset-based fees are paid in arrears and may be charged based on the total assets under management on the last day of the previous quarter or based on the average daily balance of your account. Fee schedules vary based upon the strategy (High Yield Bonds, Investment Grade Bonds, etc.) and may be flat or tiered based upon the asset level of your account(s). You should

<http://www.fwcapgmt.com>

review the fee schedule in your agreement and/or FWCM's ADV Part 2A, Item 5 to see how your account's asset level potentially reduces fees. Clients who are invested in the First Western-managed mutual funds will only pay only those fees charged to investors by the mutual fund. Although not common, clients may pay performance-based fees for certain strategies. Performance-based fees are calculated based on a share of capital gains on or capital appreciation of the assets of the account. In addition to the fee(s) above, you will be responsible for certain charges imposed by the custodian and/or broker, including transaction fees, custodian fees (e.g. wire fees), and internal fees related to mutual funds.

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, please refer to FWCM's ADV Part 2A, Items 5, 6, and 7 at <https://adviserinfo.sec.gov/firm/brochure/152982>.

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?*

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 are 100% owned by First Western Financial, Inc. & services are offered directly or through the bank.
- We may recommend the use of our proprietary mutual funds in our separately managed accounts.
- Performance-based fee arrangements create an incentive to recommend riskier or more speculative investments than those which would be recommended under different fee arrangements and potentially create the incentive to favor accounts paying performance fees over those accounts that do not. We address these conflicts by implementing trade allocation and aggregation procedures that seek to treat all accounts fairly and equally.
- Our firm pays referral fees to certain independent persons or firms (“Solicitors”) for introducing clients to us.

For additional information regarding our conflicts of interest, please refer to **FWCM's ADV Part 2A, Items 10 and 12** at <https://adviserinfo.sec.gov/firm/brochure/152982>.

Conversation Starters. Ask your financial professional –

- 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 paid a salary plus discretionary bonuses based on individual and company performance, which is based upon metrics like client retention, investment performance, and new business generation.

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

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters. Ask your financial professional –

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

Additional Information

For additional information about our services, including up-to-date information about the firm and/or a copy of this disclosure, please call Barry Julien at (310) 229-2940.

Conversation Starters. Ask your financial professional –

- Who is my primary contact person? Is he or she a representative of an investment adviser or broker dealer? Who can I talk to if I have concerns about how this person is treating me?