

# Customer Relationship Summary

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## Item 1 - Introduction

Breakwater Capital, LLC (CRD No. 172498) “Breakwater” is registered with the Securities and Exchange Commission as an investment adviser. Advisory services and fees are different from brokerage services and fees. It is important to understand the difference and carefully consider which account type and the services that are right for you. This document provides a summary of the types of services provided by Breakwater and the associated fees. In addition, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which provides educational materials about broker/dealers, investment advisers, and investing.

## Item 2 - Relationships & Services

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

Breakwater strives to meet (in-person, phone, video) with clients, no less than annually, to provide investment advice, develop strategies and define goals as well as regularly monitor investments as part of our standard services. Assets are managed on a discretionary basis. Discretionary authority allows securities to be bought and sold without asking in advance and without material limitations whereas non-discretionary authority would require permission prior to each transaction. Breakwater provides investment management and financial planning for a fee based upon a percentage of the market value of assets being managed. Breakwater generally includes financial planning in its investment management fee for clients whose investment management fee exceeds \$5,000 annually. For clients who wish to engage the firm for financial planning services only, or whose management fee is less than \$5,000 annually, the firm charges on an hourly basis. These fees are negotiable, but generally range from \$100 to \$250 on an hourly basis, depending on the level and scope of services as disclosed in our [ADV 2A](#). Advisory services are not limited to proprietary products or a limited menu of products. There is a minimum of \$250,000 to open an account, subject to case-by-case exceptions.

**Conversation Starters:** *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?*

## Item 3 - Fees, Costs, Conflicts and Standard of Conduct

### What Fees will I Pay?

Fees and costs affect the value of your account over time. Breakwater charges a management fee based on a percentage of assets under management. You pay our asset management fee even if you do not buy or sell and whether you make or lose money during the billing period. Breakwater has a fiduciary duty to manage an account in a cost-effective manner and considers custodian fees, account maintenance fees, fees related to mutual funds (12b-1 fees) and variable annuities, and other transactional fees (ticket charges) and product-level fees when making investment recommendations. In a wrap fee program, the asset-based fee will include most transaction costs and fees to the broker/dealer or bank that will hold your assets (called “custody”) and as a result wrap fees are typically higher than non-wrap advisory fees. Although transaction fees are usually included in the wrap program fee, sometimes you will pay an additional transaction fee for an investment bought or sold outside the wrap fee program. Paying for a

wrap fee program could cost more than separately paying for advice and for transactions if there are infrequent trades in your account. Breakwater does not sponsor a wrap fee program.

**What are your legal obligations to me when acting as my investment adviser?**

As an investment adviser, we always have a fiduciary duty to act in your best interest.

**How else does your firm make money and what conflicts of interest do you have?**

Breakwater does not offer proprietary products, receive payments from third parties for investment advice, participate in a revenue sharing agreement or conduct principal trading. The more assets you have in an advisory account, the more you will pay us. We therefore have an incentive to grow the assets in your account to increase our advisory fees. Additional information about conflicts of interest are available in our [ADV 2A](#).

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

Financial Professionals are compensated based on a percentage of assets under management. The percentage charged is based on the scope and complexity of your account, the amount of time and expertise required as well as the account value. Financial Professionals can also make money by providing financial plans or hourly consulting.

*Conversation Starters: "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? How do conflicts of interest affect me, and how will you address them?"*

**Item 4 - Disciplinary History**

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

Breakwater has no disciplinary history to disclose; however, we encourage you to visit [Investor.gov](#) for a free and simple search tool to research our firm and our financial professionals. To report a problem to the SEC, visit [Investor.gov](#) or call the SEC's toll-free investor assistance line at (800) 732-0330.

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

**Item 5 - Additional Information**

You could open a brokerage account with a broker/dealer, where you pay a transaction-based fee, generally referred to as a commission, when the broker/dealer buys or sells an investment for you. With a broker/dealer, you can select investments, or the broker/dealer may recommend investments for your account, but the ultimate decision to buy or sell will be yours. A broker/dealer must act in your best interest and not place its interests ahead of your interest when recommending an investment or an investment strategy involving securities. When a broker/dealer provides any service to you, the broker/dealer must treat you fairly and comply with a number of specific obligations. Unless you and the broker/dealer agree otherwise, the broker/dealer is not required to monitor your portfolio on an ongoing basis. If you were to pay a transaction-based fee in a brokerage account, the more trades in your account, the more fees the broker/dealer charges you. Consequently, the broker/dealer has an incentive to encourage you to trade often. You can receive investment advice in either type of account, depending on the fee structure you prefer. To request an up dated Customer Relationship Summary, please contact us at (269) 903-2360.

*Conversation Starter: 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?*