



## Which Type of Account is Right for You — Brokerage, Investment Advisory or Both?

Brokerage and investment advisory services and fees differ; it is important for you to understand these differences. Free simple tools are available at [investor.gov/CRS](http://investor.gov/CRS), which also provides education materials about broker-dealers, investment advisers and investing.

Liberty Capital Investment is registered with the SEC as a Broker-Dealer and as an Investment Adviser with some individual states. Depending on your needs and investment objectives, we can provide services in a brokerage account, investment advisory account, or both, at the same time.

This document is a summary of the types of services we provide and how you pay. Please ask us for more information.

Broker-Dealer Services - Brokerage Accounts	Investment Adviser Services - Advisory Accounts
<b>What investment services and advice can you provide me?</b> <i>Our accounts and services fall into two categories offered to retail investors.</i>	
<ul style="list-style-type: none"> <li>If you open a brokerage account, you will pay us a <b>transaction-based fee</b>, generally referred to as a commission, every time you buy or sell an investment.</li> <li>You may select investments or we may recommend investments, but the ultimate investment decision for the purchase or sale of investments will be yours.</li> <li>We do not offer discretionary trading, account monitoring or proprietary products.</li> <li>We do not have account minimums.</li> <li>We will deliver account statements to you each quarter in paper or electronically.</li> <li>Other firms could offer a wider range of choices, some of which might have lower costs.</li> </ul>	<ul style="list-style-type: none"> <li>If you open an advisory account, you will pay an on-going <b>asset-based fee</b> for our services.</li> <li>We will offer you advice on a regular basis, discuss your investment goals, design a strategy and monitor your account.</li> <li>You may select investments or we may recommend investments, but the ultimate investment decision for the purchase or sale of investments will be yours.</li> <li>We do not offer discretionary trading, account monitoring or proprietary products.</li> <li>Account minimum is \$25,000</li> <li>We will deliver account statements to you each quarter in paper or electronically.</li> <li>Other firms could provide advice on a wider range of choices, some of which might have lower costs.</li> </ul>
<b>Conversation Starters:</b> <ul style="list-style-type: none"> <li><b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li> <li><b>How will you choose investments to recommend to me?</b></li> <li><b>What is your relevant experience, including licenses, education and other qualifications? What do these qualifications mean?</b></li> </ul>	
<b>What fees will I pay?</b> Fees and costs reduce any amount of money you make on your investments over time. You will pay fees and costs whether you make or lose money on your investments. Please make sure you understand what fees and costs you are paying.	
<ul style="list-style-type: none"> <li><b>Transaction-based fees.</b> You will pay us a fee every time you buy or sell an investment. This fee, commonly referred to as a commission, is based on the specific transaction and not the value of your account.</li> <li>With stocks or exchange-traded funds, this fee is usually a separate commission. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a <b>"mark-up"</b> or <b>"mark down"</b>). With mutual funds, this fee (typically called a <b>"load"</b>) reduces the value of your investment.</li> <li>Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Also, with certain investments such as variable annuities, you may have to pay fees such as <b>"surrender charges"</b> to sell the investment.</li> <li>Our fees vary and are negotiable. The amount you pay may depend, for example, on how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us. Breakpoint sales and letters of intent are available to investors of mutual funds to lessen transaction-based compensation.</li> <li>Investors may incur custodial fees and/or other expenses charged by our custodian. We do not charge IRA custodian fees, however there may be charges for small balance inactivity fees and/or IRA termination fees. The more transactions in your account, the more fees we charge you. We therefore have an incentive to encourage you to engage in transactions.</li> </ul>	<ul style="list-style-type: none"> <li><b>Asset-based fees.</b> You will pay an on-going fee each quarter based on the value of the cash and investments in your advisory account.</li> <li>The amount paid to our firm and your financial professional does not vary based on the type of investments in your account. The asset-based fee will be deducted from your account and thus will reduce the value of your account.</li> <li>Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time. 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. You may pay a transaction fee when we buy or sell an investment for you.</li> <li>The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. You pay our fee quarterly even if you do not buy or sell.</li> <li>An asset-based fee may cost more than a transaction-based fee; you may prefer an asset-based fee if you want continuing advice or want someone to make investment decisions for you. You may prefer a wrap fee program if you prefer the certainty of a quarterly fee regardless of the number of transactions you have.</li> <li>Investors may incur custodial fees and/or other expenses</li> </ul>

<ul style="list-style-type: none"> <li>Option contracts may incur a fee per number of contracts.</li> <li>Variable annuities/insurance products impose fees and charges to the owner to cover insurance and investment services.</li> <li>From a cost perspective, you may prefer a transaction-based fee if you do not trade often or if you plan to buy and hold investments for longer periods of time.</li> </ul>	<p>charged by our custodian. We do not charge IRA custodian fees, however there may be charges for small balance inactivity fees and/or IRA termination fees.</p> <ul style="list-style-type: none"> <li>Option contracts may incur a fee per number of contracts.</li> </ul>
<b>Broker-Dealer Services - Brokerage Accounts</b>	<b>Investment Adviser Services - Advisory Accounts</b>
<b>Conversation Starter:</b> <ul style="list-style-type: none"> <li>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?</li> <li>What additional costs can I expect to pay in relation to my account?</li> </ul>	
<b>What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?</b> When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you. Here are some examples to help you understand what this means.	
<ul style="list-style-type: none"> <li>We must act in your best interest and not place our interests ahead of yours when we recommend an investment or strategy involving securities. When we provide any service to you, we must treat you fairly and comply with a number of specific obligations. Unless we agree otherwise, we are not required to monitor your portfolio or investments on an ongoing basis.</li> <li>Our interests can conflict with your interests. When we provide recommendations, we must eliminate these conflicts or notify you of them and, if possible, reduce them.</li> <li>We do not allow securities transactions that provide extra financial incentives to our representatives.</li> <li>We do not carry inventory, carry our own accounts or make a market in securities.</li> <li>When investing in directly held mutual fund and annuities, we may receive compensation from the custodian.</li> <li>Charges are transactional so, as a result, the more transactions we do in your account, the more fees we may earn.</li> <li>Products of Liberty Capital clients are limited to those made available through our clearing company, Hilltop Securities.</li> </ul>	<ul style="list-style-type: none"> <li>We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis.</li> <li>Our interests can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand so that you can decide whether or not to agree to them.</li> <li>We do not allow securities transactions that provide extra financial incentives to our representatives.</li> <li>We do not carry inventory, carry our own accounts or make a market in securities.</li> <li>When investing in directly held mutual fund and annuities, we may receive compensation from the custodian.</li> <li>Products of Liberty Capital clients are limited to those made available through our clearing company, Hilltop Securities.</li> </ul>
<b>Conversation Starter:</b> <ul style="list-style-type: none"> <li>How might your conflicts of interest affect me and how will you address them?</li> <li>For additional information see our Form ADV, Part 2A brochure.</li> </ul>	
<b>How do your financial professionals make money?</b>	
<ul style="list-style-type: none"> <li>Our financials professionals are paid only on a cash basis; no non-cash compensation is paid to our reps.</li> <li>Our financials professionals are not compensated based on client assets, product commissions, products sold or firm revenue.</li> </ul>	<ul style="list-style-type: none"> <li>Our financials professionals are paid only on a cash basis.</li> <li>Our financials professionals are not compensated based on client assets, product commissions, products sold or firm revenue.</li> </ul>
<ul style="list-style-type: none"> <li><b>Do you or your financial professionals have legal or disciplinary history?</b> For the most current records of legal or disciplinary history visit <a href="https://www.investor.gov/CRS">Investor.gov/CRS</a> and <a href="https://www.brokercheck.finra.org">BrokerCheck.finra.org</a>. For additional information see our Form ADV brochure on IAPD on <a href="https://www.investor.gov">Investor.gov</a>, or request a copy from your financial professional.</li> </ul>	
Yes	
<b>Conversation Starter:</b> <ul style="list-style-type: none"> <li>As a financial professional, do you have any disciplinary history? If so, for what type of conduct?</li> </ul>	
<b>Additional Information.</b> We encourage you to seek out additional information.	
<ul style="list-style-type: none"> <li>If you would like additional, up-to-date information or a copy of this disclosure, please call us at (503)225-9393 or contact us in writing at 1618 S.W. 1<sup>st</sup> Avenue, Ste. 425 Portland, OR 97201.</li> </ul>	
<b>Conversation Starter:</b> <ul style="list-style-type: none"> <li>Who is my primary contact person? Is he or she a representative of an investment-adviser or broker-dealer?</li> <li>Who can I talk to if I have concerns about how this person is treating me?</li> </ul>	