

## Noble Capital Markets, Inc. - Client Relationship Summary -6/30/2020

**Noble Capital Markets, Inc.** is registered with the U.S. Securities and Exchange Commission (S.E.C.) and with Financial Regulatory Authority (FINRA), as a broker-dealer and is a member of the Securities Investor Protection Corporation (SIPC). We are also affiliated with Noble Capital Management, Inc. which is registered with the State of Florida as an Investment Adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences.

This document is a summary of the services and fees we offer to Retail Investors which are natural persons who seek or receive securities services primarily for personal, family, or household purposes. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS) which also provides educational materials about broker-dealers, investment advisers, and investing and [brokercheck.finra.org](http://brokercheck.finra.org) which provides pertinent facts including disciplinary history about member firms and individual registered representatives.

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

As a broker-dealer, we offer solicitation & execution of private placements and public offerings, ETFs, equities, unit investment trusts, mutual funds, options & fixed income securities. In addition, we publish and distribute equity research.

**Account Monitoring:** We do not provide account monitoring services for your brokerage accounts. Financial professionals may voluntarily review account holdings from time to time, but these reviews do not constitute an account monitoring service.

**Investment Authority:** We manage brokerage accounts on a *non-discretionary* basis whereby we will provide advice, but *you will ultimately decide* which investments to buy and sell.

**Account Minimums and Requirements:** We do not require a minimum dollar amount to open and maintain an account. However, some products may have minimums, please refer to the investment prospectus for specific information. Private Placement securities may require a minimum investment. For specific information regarding a particular offering please refer to the offering memorandum.

### Key Questions to Ask Your Financial Professional

- ✓ **Given my financial situation, should I choose a brokerage service, an advisory service, or both? 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?

As a retail investor you are charged fees on a per transaction basis and therefore the firm may have an incentive to encourage an investor to participate in transactions. As a retail investor you are charged a variety of fees which have been detailed below:

- **For private placements** please refer to the offering memorandum for fee information.
- **For brokerage accounts** there are transaction and processing fees and expenses specific to various transactions and/or execution of securities within your brokerage account. This would include SEC fees, confirmation charges, retirement account custodian charges, paper statements / confirms fees, wire transfer fees, and annual inactivity fees. For specific information regarding our fees please visit our Noble Fee Schedule at [https://www.noblecapitalmarkets.com/media/Noble\\_Capital\\_Client\\_Fee\\_Schedule.pdf](https://www.noblecapitalmarkets.com/media/Noble_Capital_Client_Fee_Schedule.pdf).
- **Product-level fees** for the specific securities within a brokerage securities account including mutual funds, annuities, REITs, 529s and ETFs. For information regarding these fees please refer to the prospectus.

In addition to our principal fees and costs for brokerage services, there are other common fees and costs that maybe applicable to our clients that include: custodian fees related to mutual funds, exchange-traded funds & variable insurance products, including surrender charges.

**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.**

**Key Question to 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 providing recommendations? How else does your firm make money and what conflicts of interest do you have?**

**When we provide you with a recommendation, 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, we provide you. Here are some examples to help you understand what this means:

- For brokerage accounts, the more trades you place, the more commissions we charge thus we have an incentive to encourage more trading.
- *Persons* providing advice on behalf of our firm may be registered as both a registered representative of our broker dealer, as well as an investment advisor representative of our affiliated registered investment adviser. These individuals receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned is separate and in addition to advisory fees or broker dealer fees depending on the capacity that the individual is acting. This practice presents a conflict of interest since these individuals have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- *Our brokerage services and recommendations* cover a limited selection of investments. Other firms could provide a wider range of choices, some of which may have lower costs.

**Key Question to Ask Your Financial Professional**

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

For additional information on our firm conflicts of interest, please see our Regulation Best Interest Disclosure at [https://www.noblecapitalmarkets.com/media/Reg\\_BI\\_Disclosure\\_Supplement.pdf](https://www.noblecapitalmarkets.com/media/Reg_BI_Disclosure_Supplement.pdf).

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

The Company and the financial professional servicing your account(s) are compensated based via salary, commissions, and bonus. The determining factors for the level of compensation is the amount of time spent on a particular transaction, complexity required to meet client needs, or revenue earned by the firm from the financial professional's services or recommendations.

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

Yes. Disclosures for our firm and or our financial professionals can be found by going to <http://www.investor.gov/CRS> and/or <http://www.brokercheck.com>.

**Key Questions to Ask Your Financial Professional**

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

**For additional information about our services, please visit our website at <http://www.noblecapitalmarkets.com/>. You can find additional information about our brokerage services and request a copy of the relationship summary at 561-994-1191 or [compliance@noblecapitalmarkets.com](mailto:compliance@noblecapitalmarkets.com)**

**Key Questions to Ask Your Financial Professional**

- ✓ **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?**