



Item 1. Introduction

Oliver Capital Management, Inc. (“OCM” “we” “us” and “Advisor”) is a Washington corporation registered as an investment advisor under the laws of the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand the 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 advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We provide Comprehensive Wealth Management Services to our Clients. Wealth Management Services involves providing advice to Clients on the most effective investment strategies given the particular Client’s personal and business goals. Once the Client agrees to an investment strategy, we will take the steps necessary to implement such strategy. OCM utilizes Fidelity Institutional and Schwab Institutional as third-party custodians for Client assets. Client assets are primarily invested in our Strategically Engineered Portfolio Program (SEPP), in accordance with our Statement of Investment Policy or a similar document utilized to establish our Client’s objectives and suitability.

OCM also provides financial planning for its Clients as part of a Comprehensive Wealth Management (CWM) approach to serving its Clients. There is no minimum net worth requirement and no additional fees are charged for such financial planning services.

We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will contact you (by phone or e-mail) at least annually to discuss your portfolio.

With very limited exception, OCM manages Client accounts and assets on a non-discretionary basis. This means that OCM has no authority to execute its investment recommendations without obtaining the Client’s prior approval. Accordingly, all transactions made in a Client’s account are made in accordance with the

directions and preferences provided to us by the Client. We are then able to implement those trades in the Clients’ account. Client’s grant us the ability to trade in their account by way of a limited power of attorney document signed with the applicable custodian of their account.

OCM has an account minimum of \$500,000.

Conversation Starter: We encourage you to ask our financial professionals these key questions about our investment services and accounts:

- (i) *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- (ii) *How will you choose investments to recommend to me?*
- (iii) *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?

We provide investment advisory services for a fee based on a percentage of assets under management. We are compensated solely by our clients and do not receive compensation or commissions from any other parties. We believe this method of compensation minimizes the conflicts-of-interest that are prevalent in the investment management industry. Our fee is provided in your Investment Advisory Agreement based upon a tiered schedule from 1.25% to 0.40%. Households that do not meet the \$500,000 published account minimum are subject to an additional 0.25% per year management fee. The fee is calculated quarterly, in advance, and will be equal to the respective percentage per annum based on the market value of your account(s) on the last trading day of the previous quarter.

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 regardless of whether we buy or sell securities within that quarter. Client may be required to pay, in addition to OCM’s fee, a proportionate share of any Exchange Traded Fund’s (ETF) or mutual fund’s fees and charges. There are no annual account maintenance fees. OCM pays for all other annual Custodial Fees directly to Custodian.



All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account, if any, will be paid out of the assets in the account and are in addition to the investment management fees paid to OCM.

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.

Conversation Starter: We encourage you to ask us any questions you may have regarding our fees or how cost from third parties such as custodians or mutual funds affect your account. For example, start a conversation by asking, “*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:

Example 1: Your account value goes up, and while the management fee percentage may stay the same, the total compensation you pay us goes up proportionately. Example 2: Your account value goes down, but you still must pay a management fee proportional to your assets under management.

Conversation Starter: If you have any questions regarding conflicts of interests, please feel free to ask us. You can begin a conversation by asking, “*How might your conflicts of interest affect me, and how will you address them?*”

How do your financial professionals make money?

OCM is a fee-only registered investment advisor, which means our only form of compensation is from investment management fees paid directly from our clients. We do not earn any commissions or any other payments from anyone else.

Our financial professionals are compensated based upon the assets under management and revenue derived from clients.

For more detailed information, including fee schedules, conflicts of interest, and other disclosures are available in our ADV Part 2A Firm Brochure, which is available at: <https://adviserinfo.sec.gov/>.

Item 4. Disciplinary History

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

Yes. We encourage you to visit Investor.gov/CRS for a free and simple search tool to research any of our financial professionals. ***Conversation Starter:*** In addition, feel free to ask: “*As a financial professional, do you have any disciplinary history? For what type of conduct?*”

Item 5. Additional Information

You can find additional information regarding Oliver Capital Management, Inc. and receive a copy of this Client Relationship Summary by visiting our website at <http://www.olivercapital.com> or by contacting (206) 775-7500.

We are always available to answer any of your questions.

Conversation Starter: If you do have any concerns, please let us know by asking 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?*”



Summary of Material Changes

The following material changes were made to this Client Relationship Summary since the version dated June 2, 2020:
Our main phone number changed to (206) 775-7500.