

CLIENT RELATIONSHIP SUMMARY

JUNE 21, 2023

Is An Investment Advisory Account Right For You?

Brookstone Capital Management, LLC and Brookstone Wealth Advisors, LLC (BCM and BWA, or our firm) are each investment advisers registered with the U.S. Securities and Exchange Commission (“SEC”). The services of and fees for brokerage and investment advisory services differ, and it is important for you to understand those differences. Free and simple tools are available to you to research our firm, other firms and Financial Professionals at <https://www.investor.gov/CRS>, where you may also find important educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

Our firm provides Asset Management and Financial Planning Services to retail clients, like you. Our services include fee based programs including a WRAP fee program (i.e., an investment account where you are charged a single, bundled, or “WRAP” fee for investment advice, brokerage services, administrative expenses, and other fees and expenses), and a non-WRAP program where you are assessed transaction charges for trading in addition to our advisory fee. You will collaborate with your Investment Adviser Representative (“Financial Professional”) to determine which services to employ to best help you reach your financial goals. We manage and customize investment portfolios, on a discretionary basis, according to your investment objectives, needs, risk tolerance, investment horizon and other pertinent information. Our financial planning services include data gathering and analysis, along with creating a financial plan with specific recommendations and implementing advice tailored to your needs. Our Financial Professionals will discuss your investment goals, design with you a strategy to help achieve your investment goals, and regularly monitor your account. Your Financial Professional will monitor your portfolio on an ongoing basis and will contact you (by phone or email) periodically to discuss your portfolio. For discretionary accounts, our firm has authority to determine the type of securities (including mutual funds, exchange traded funds, equities, fixed income securities and other products) bought and sold in your account without asking you in advance. However, you will still have the ability to give trading requests when desired. Please see our firm brochure, **Form ADV 2A, Item 4**, for additional information regarding our services and **Item 12** for information regarding our brokerage and trading practices.

Ask one of our Financial Professionals:

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?

Minimum account size requirements are between \$5,000 and \$100,000. We may, at our discretion, accept accounts below the minimum required amount. Other firms could provide advice on a wider range of choices, some of which will have lower costs.

*For further information about our services and advice, please read **Items 4, 7 and 8 of our Form ADV Part 2A** brochure. Click here for a copy or go to www.adviserinfo.sec.gov.*

What fees will I pay?

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. If you open an advisory account, you will pay an ongoing asset based fee at the end of each month for our services. The fee is based on the value of the cash and investments in your advisory account, pro-rated for the month, if applicable. Your annual fee will typically be between 1.5% and 2.50% depending on the investment models and services selected. The annual fee includes two parts: the firm fee and your Financial Professional’s fee. The firm fee is a set fee; the Financial Professional’s fee is decided between you and the Financial Professional. Accounts are also charged a monthly fee up to \$8 which is used for software allowing our firm and your Financial Professional to consolidate all accounts through a portfolio accounting system and create consolidated, on-demand performance reports. This fee is charged regardless of whether the technology is used or not. If your account’s assets are below \$8,000, we will proportionately reduce this monthly fee by \$1 per every \$1,000. These fees reduce the value of your account and will be deducted from your account on a monthly basis. Our fees vary and are negotiable. The total amount you pay will depend on the services you receive and the amount of assets in your account.

Some accounts are held in our wrap program. The wrap program fees may cost you more than paying separately for advice and trades if the account trades infrequently. In some cases, no-transaction fee securities may be available in a non-wrap fee program and BCM or BWA will endeavor to utilize no-transaction fee securities when possible and appropriate for the

account. The no-transaction fee securities are available if the client elects for electronic delivery of statements and trade confirmations.

Some investments (such as mutual funds and exchange traded funds) impose additional internal fees that will reduce the value of your investment over time. Please note that your brokerage account may be charged service fees by the clearing firm, for account closing, or similar servicing fees, in addition to your wrap fees.

Proprietary Products: BCM and BWA have affiliated exchange traded funds (ETFs) that are used within some of our investment models. Our firm will receive an additional management fee for their use.

*More detailed information about our fees and other costs associated with investing, along with applicable conflicts, can be found in **Items 5, 10 and 14 of our Form ADV Part 2A** disclosure brochure. For a copy, go to www.adviserinfo.sec.gov or ask your Financial Professional to provide you with a copy.*

Ask one of our Financial Professionals:

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.

Ask one of our Financial Professionals:

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

We have an incentive to increase your account in value. Since fees charged are a percentage of your account, the larger your account value the more in fees we earn. Also, if your Financial Professional recommends a non-advisory product such as insurance or an annuity, and you transact in the insurance product, the Financial Professional will earn a commission. While the receipt of commissions creates an

existing conflict (because the Financial Professional is incentivized to make the recommendation), you are free to reject an/or implement such recommendations with any Financial Professional of your choosing. Please refer to our firm brochure **Form ADV 2A** for important additional information regarding annuity and insurance products.

*More detailed information about our conflicts of interest can be found in **Items 4, 5, 8, 10, 11, 12 and 14 of our Form ADV Part 2A** disclosure brochure. For a copy, go to www.adviserinfo.sec.gov or ask your Financial Professional to provide you with a copy.*

How do your Financial Professionals make money?

Our Financial Professionals make money from the fees charged to manage your investments. They can earn up to 1.55% of the annual management fee charged to your account. The 1.55% is included in the total fee as described above and in the firm brochure, **Form ADV 2A**. Additional information about compensation arrangements for our Financial Professionals and related conflicts of interest are found in the Financial Professional **Form ADV 2B**.

Do you or your Financial Professionals have legal or disciplinary history?

Yes, some of our Financial Professionals have legal and/or disciplinary histories; however, our firm does not. Please visit Investor.gov/CRS for a free and simple search tool to research our firm and your Financial Professional.

Ask your Financial Professional:

As a Financial Professional, do you have any disciplinary history? For what type of conduct?

Additional Information

If you have a problem with your investments, account or Financial Professional, contact us by email at compliance@brookstonecm.com or call (630) 923-6850. You may also write to us at: Brookstone Capital Management, LLC, Attn: Compliance Department, 1745 S. Naperville Rd. Suite 200, Wheaton, IL 60189.

Ask one of our Financial Professionals:

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 the person is treating me?

BROOKSTONE CAPITAL MANAGEMENT LLC & BROOKSTONE WEALTH ADVISORS, LLC PRIVACY POLICY

At Brookstone Capital Management LLC (BCM) and Brookstone Wealth Advisors LLC (BWA) your trust is our top priority. The confidentiality of your personal financial information is of paramount importance to all of us, and we will remain vigilant in protecting your privacy. We are sending you this privacy notice to help you understand how we use your private financial information, and to let you know what we do to help protect your privacy.

What Information Do We Collect From You and About You?

To serve your client needs, BCM and BWA collect information from you and about you. Some of this information is collected to satisfy certain legal and regulatory requirements, while other information is collected so that we can service your account effectively. Examples of the information that we collect includes:

- Information from your account application and other forms, such as name, address, Social Security number, telephone number, employment information, income, net worth, investment experience, and other information to service your account effectively. We may also collect information from consumer reporting agencies
- Information about your financial transactions, including securities purchased and sold, fund transfers, account balances, and other account activities.

To Whom Do We Disclose Your Information?

BCM and BWA do not sell your personal financial information to anyone. However, we do disclose your personal information to third parties or outside companies that help us process your transactions or service your account. One such company is the clearing firm which processes your transactions and acts as the account custodian. We may also provide information to outside service providers that help administer your accounts. Any outside company or third party provider must limit their use of your information to the purpose for which it was provided.

BCM and BWA may also provide your personal information when permitted or required by law or regulation. Examples include providing information in response to a subpoena or court order, to cooperate with regulators, governmental authorities or law enforcement authorities, or in response to a request from a consumer reporting agency.

Outside of these circumstances, we will not provide your personal information to third parties unless you have specifically asked us to do so.

What Do We Do To Protect Your Personal Information?

We restrict access of your personal financial information to personnel who require that information to service your business. All employees are trained regarding the policies and procedures encompassed by this privacy policy. We maintain physical, electronic, and procedural safeguards to guard your personal information. This privacy policy applies to all of our current and former clients. If in the future this privacy policy needs to change for any reason, we will provide you with written notification of the change, allowing you the opportunity to opt-out.

If you wish to receive the latest BCM or BWA Form ADV Part II, or for any questions regarding BCM's and BWA's privacy policy, please call us at (866) 425-3003.

Additional Information for California Residents

THE CCPA

The California Consumer Privacy Act ("CCPA") is a sweeping piece of legislation that grants California residents increased control over their personal data.

The CCPA allows consumers to find out what personal information of theirs has been gathered, to request that businesses delete their data, to opt out of having their information sold, and more. It requires affected companies to create processes to comply with and facilitate consumer data requests, to update their privacy policies, and to assure that their vendors comply as well.

This privacy notice provides the details you need to understand your rights under the CCPA, and to exercise those rights. It provides you with the contact information you need to take action regarding the privacy of your data.

YOUR PII RIGHTS

The CCPA provides you with certain rights in regard to what we do with your personally identifiable information ("PII"). This section details those rights, how to exercise them, and what BCM or BWA will do in response.

DISCLOSURE

You have the right to request that we disclose to you, free of charge, the categories, and specifics of the PII we collect about you and/or, otherwise disclose about you to a third party for business purposes. We require a verifiable request from you to ensure that it is, in fact, you who is requesting such a PII disclosure. Once we verify the request, we will provide that information to you.

Your request for disclosure can apply to any PII we collect about you for as long as twelve months preceding your request. We are not required to disclose information about the PII we collect about you more than twice in a twelve-month period.

Following our verification of your request, we will disclose to you, unless otherwise restricted by law or regulation, the following PII we collect about you:

1. The categories of personal information we have collected about you
2. The categories of sources from which the personal information is collected
3. The business or commercial purpose for collecting or selling that personal information
4. The categories of third parties with whom we share personal information
5. The specific pieces of personal information we have collected about you

Following our verification of your request, we will disclose to you, unless otherwise restricted by law or regulation, the following PII about you that we sell to a third party or otherwise disclose for business purposes:

1. The categories of personal information we have collected about you that we disclose
2. The categories of sources from which that personal information is collected
3. The business purpose for collecting, and/or disclosing that personal information

OPTING OUT

BCM and BWA do not sell client information to third parties at the current time. Should this change in the future, BCM or BWA would adopt policies and procedures to comply with legal and regulatory requirements, including providing the ability to opt-out of these practices.

DELETION OF PII

You have the right to request that we delete PII we have collected from you. Following our verification of your request, we will comply with your request and delete any or all of your PII in our possession that we collected from you and/or any or all such PII in the possession of our service providers, unless otherwise restricted by law or regulation. Specifically, BCM and BWA may be limited in their ability to delete certain PII since, as an SEC-registered investment adviser, it is required by securities law to maintain certain books and records. If BCM or BWA is not required to maintain certain PII, it will honor requests for deletion of such information.

NON-DISCRIMINATION FOR EXERCISING YOUR PII RIGHTS

We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this privacy notice.

CONTACTING US TO EXERCISE YOUR PII RIGHTS

You may contact us in order to exercise any of your rights set forth in this privacy notice by calling this toll-free number, 1-(866) 425-3003, emailing us at compliance@brookstonecm.com, or visiting our website <https://www.brookstonecm.com/>.