

Is An Investment Advisory Account Right For You?

Brookstone Capital Management, LLC (BCM or our firm) is an investment adviser 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?

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 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 has affiliated mutual fund and 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.*

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 form 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?