



Atlas Capital Management Corp. (ACMC) is an investment advisor registered with the Securities and Exchange Commission. We feel it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS which also provides educational materials about investment advisors, broker-dealers and investing.

What types of investment services and advice can you provide me?

Discretionary Investment Management: ACMC offers fee-based discretionary investment management services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and business entities. If you open an account with our firm, a financial professional will meet with you to understand your current financial situation, existing resources, goals and risk tolerance. The financial professional will explain the various strategies available, the risks of each, and aid you in completing the paper work necessary to retain ACMC which includes your selection of strategies, and the percentage of each, for your portfolio. All strategies are monitored daily, and if necessary, appropriate trades are executed to meet the objectives of each respective strategy. The strategies and the percentage of each to be used in your portfolio are contained within our Investment Management Agreement which you would have executed upon retaining ACMC. Our agreement is available on our web site at www.atlascapitalmanagement.com. Descriptions of all strategies may be found on our web site and in our Form ADV Part 2A in Item 8, available online at www.atlascapitalmanagement.com. The vast majority of our accounts are managed on a discretionary basis which means we don't need to call you when buying or selling in your account. The investment management agreement you executed gives us this authority. This agreement will remain in place until you or we terminate the relationship.

Financial Consulting: Our financial consulting service is on an as-needed basis. Advice regarding your account could be as a result of our review or your request for advice. All decisions regarding the purchase or sale on any investment within these accounts is completely yours. Additional information on our investment management services may be found in Item 4 of Form ADV Part 2A, available online at www.atlascapitalmanagement.com.

Questions to ask us:

- ***Given my financial situation, should I choose an investment management 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 those qualifications mean?***

What fees and costs will I pay?

Our fee is based on the market value of your account on the last day of the quarter/month (additions and withdrawals are pro-rated), or the average daily balance of your account during the quarter/month. The management fee is charged either monthly or quarterly, depending upon the custodian of your account. Our annual standard fee schedule is as follows: 2.00% for the first \$250,000, 1.75% for the next \$250,000, 1.5% for the next \$500,000, and 1.0% in excess of \$1,000,000. Accounts residing in the same household are combined in value for fee computation. In certain instances, the fee may be negotiable at the discretion of the president of ACMC. The broker-dealer/custodian that holds your assets may charge you a custody fee, this fee is in addition to our management fee. Some investments, such as mutual funds, annuities and exchange traded funds charge internal management fees. You are responsible for all transaction and brokerage fees that may occur. You will pay fees whether you make money or lose money on your investments. ***Fees and costs will reduce any amount of money you make on your investments over time.*** It is important that you understand what fees and costs you are paying. Additional information about our fees and compensation is located in Item 5 of our Firm Brochure which is immediately available online at www.atlascapitalmanagement.com.

Questions to ask us:

- ***Help me understand how these fees and costs will 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?***
- ***How do you determine what fee will be charged?***



What are your legal obligations to me when acting as my investment adviser? How does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have a fiduciary obligation, by law, to place the interest of our clients ahead of our own and the firm. We charge an investment management fee based on the assets we manage. **We may therefore have an incentive to recommend adding assets to an account that we manage thus increasing the fee you pay us.** Atlas offers proprietary strategies built with its trade signals and strategies created using trade signals from independent signal providers. **This creates a financial incentive to recommend its own strategies because it does not pay a portion of the management fee to signal provider when recommending a proprietary strategy. Atlas attempts to mitigate any conflicts of interest to the best of its ability by acting in the client's best interest through its fiduciary duty.** The firm's revenue is derived from the management fees we collect from your accounts each month or quarter (depending on the custodian). ACMC provides investment management services to clients who are introduced to the firm through the client's primary investment professional. A portion of the management fee may be shared with the referring firm. This payment will not cause you to pay additional money in management fees as this payment will come directly from ACMC's portion of management fees. Our associates may recommend other products that pay commissions, such as life insurance. ACMC does not share in these commissions.

Questions to ask us:

- **How might your conflicts of interest affect me, and how will you address them?**
- **How do your financial professionals make money?**

Our firm's owner is compensated on a salaried basis and receives occasional distributions of the firm's profits. Our associates are compensated by salary and bonus. Investment Advisory Representatives of our firm share in the investment management fees paid by our clients. You can find more detailed information about our conflicts of interest in Items 10 and 14 of our Firm Brochure.

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

On October 16, 2017, Atlas executed a Consent Order with the Securities and Exchange Commission, which included the firm's consent order Instituting Administrative and Cease-and-Desist Proceedings, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order. Additional information is located in Item 9 of our Firm Brochure which is immediately available online at www.atlascapitalmanagement.com. Visit www.investor.gov/CRS for a free and simple tool to research our firm and our financial professionals.

Questions to ask us:

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

Additional Information

You can find additional information about our firm's investment management services on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 106107. You may also contact our firm at (260) 637-2857 and talk to one of our investment professionals or support staff.

Questions to ask us:

- **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?**

As a client, if you have been referred to ACMC via an investment professional of an unaffiliated broker-dealer or other Registered Investment Advisor, this investment professional is your primary contact. In the event they are not available or you become unhappy with their service, you may contact ACMC directly and speak with one of our investment professionals.