



Aspire Private Capital, LLC (“Aspire”) is a registered investment adviser with the Securities and Exchange Commission and provides investment advisory services. 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](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What Investment Services and Advice Can You Provide Me?

We offer investment management services and free educational workshops.

As part of our investment management services, we routinely monitor your account for changes (i.e., shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested). We also conduct reviews of your accounts at least annually.

You have the option to grant us discretionary or non-discretionary authority via the Investment Advisory Agreement. Discretionary authority grants us the full authority to buy, sell, manage, reinvest or otherwise effect investment transactions involving your assets without consulting with you first. You may, at any time, revoke this authority or impose reasonable restrictions. Non-discretionary authority requires your written or oral pre-approval before any transactions are implemented. We may manage your account internally or recommend a sub-adviser to manage your account. One such sub-adviser is Global Financial Private Capital, LLC (“Global”). We may also offer other third-party money managers made available through an investment platform operated by Global. For more information, please see the Form ADV for Global and the other third-party managers that manage your accounts.

We do not limit our advice to specific securities. Depending on your specific needs, experience, assets and goals, we may recommend stocks, bonds, no-load and/or load mutual funds, exchange-traded funds and cash or cash equivalents to meet your financial goals and objectives. We do not have any requirements for opening or maintaining an account, such as a minimum investment amount. Some of the investment managers we recommend, do, however, require minimum investment minimums.

For more detailed information about our services, please see Items 4 and 7 of our [Form ADV 2A “Brochure.”](#)

Conversation Starters

- 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?

What Fees Will I Pay?

Advisory Fees: You will pay an annual investment advisory fee for our services (“Advisory Fee”). This Advisory Fee is negotiable and does not usually exceed 1.90% of the total assets you place under our management. Your exact Advisory Fee is disclosed on your Investment Advisory Agreement. Advisory Fees will be billed quarterly, in advance, at the beginning of each quarter, based upon the agreed annual percentage rate and the fair market value of the assets under management on the last day of the previous quarter. For accounts held at Nationwide f/k/a Jefferson National Life Insurance Company, fees are deducted from client accounts monthly in arrears, based on the average daily account value of assets under management during the quarter and according to the agreed-upon annual percentage rate.

As described above, we hire sub-advisers to manage our clients’ accounts in some situations. The fees for these sub-advisers are paid from the Advisory Fee. Our receipt of fees for your account results in conflicts of interest. For example, Aspire retains the difference between the total Advisory Fee and the amounts, if any, paid to sub-adviser, platform providers, or third-party managers. Assuming all other costs to Aspire for providing advisory services are equal, Aspire has a conflict of interest in the form of an incentive to minimize or eliminate those third-party costs. Please review Items 4, 5 and 10 of our [Form ADV Part 2A “Brochure”](#) for detailed descriptions of these conflicts and how we address them.

(PLEASE SEE ADDITIONAL FEES AND EXPENSES CONTINUED ON THE NEXT PAGE)

What Fees Will I Pay? (*Continued*)

Other Fees and Costs: You will also pay brokerage commissions, transaction charges, handling fees, custodial fees, service charges, ticket charges and other similar charges incurred in connection with transactions for your Account(s). In addition to the fees described above, you may pay retirement plan fees, mutual fund sales loads, 12(b)-1 marketing fees charged by mutual funds, contingent deferred sales charges, annuity fees including mortality and expense charges, and surrender charges. For more information about our fees and costs, please see Item 5 of our [Form ADV 2A “Brochure.”](#)

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 Starters

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 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:

- Our investment adviser representatives are independently licensed to sell insurance products for commissions in their separate capacities as insurance agents. This creates a conflict of interest in that our representatives have an incentive to recommend insurance products.
- We receive certain products and services from broker-dealers/custodians, platform providers and other entities at no charge (or at a discount), which we use to benefits of all of our clients. This presents a conflict of interest in that we have an incentive to continue utilizing the entities that provide us with these free and/or discounted products and services.

For more information on the conflicts of interests we have, please see Items 10, 11, 12 and 14 of our [Form ADV Part 2A “Brochure.”](#)

Conversation Starters

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

How Do Your Financial Professionals Make Money?

Our IARs are compensated by salaries, incentive pay based on the amount of client assets they manage and/or small, discretionary bonuses. Some of these compensation structures present a conflict of interest in that our IARs have a financial incentive to recommend services to you and encourage you to increase the assets in your account. We manage this conflict of interest by requiring our IARs to always act in your best interest. Our IARs are not compensated any differently based on the advisory products they sell to you and do not receive any non-cash compensation.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

Yes. Visit Investor.gov/CRS for a free and simple search tool to research Aspire and our financial professionals.

Conversation Starters

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?

For more information about our investment advisory services or to request the most current version of this relationship summary, please go to AspireAdvisors.com, the SEC’s website at adviserinfo.sec.gov, or call our office at (704) 237-9927.