

June 16, 2020

Spartan Capital Securities LLC ("SCS") is registered with the Securities and Exchange Commission ("SEC") as a broker-dealer. Brokerage and investment advisory services and fees differ, and you need to understand the differences. This Client Relationship Summary provides details about our brokerage services, fees, and other important information. Free and simple tools are available for investors to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS). Here, you can also find educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide to me?

Spartan Capital Securities LLC offers brokerage services to individuals and institutions. Retail customers can open a variety of accounts, both taxable and for retirement goals, to engage in trading strategies across a broad array of investment products. SCS permits margin loans for qualified clients trading qualified products. SCS purchases and sells on behalf of its clients, equities, fixed income securities (including corporate and municipal's) options, mutual funds, exchange-traded funds ("ETF's), and real estate investment trusts ("REIT's"). The firm also offers private offerings and other less liquid investments to qualified investors. Non-registered securities transactions are offered based on a suitability analysis of the prospective customer and other factors. The firm provides recommendations to investors as solicited orders and accepts self-directed trades as unsolicited orders.

- **Monitoring**- the firm generally follows the capital markets and performs periodic account reviews based on market conditions and client objectives but does not monitor customer accounts or account holdings regularly. Thus, clients are encouraged to keep in touch with their broker when questions arise or if market conditions warrant such contact. The firm will periodically contact clients and discuss any recommendations, which may include purchases, sales, or no actions at all.
- **Investment Authority**- Accounts maintained at SCS are Non-discretionary, in that the investor makes the ultimate decision regarding the purchase or sale or maintenance of account positions for all investment decisions and transactions.
- **Limited Investment Offerings** - SCS generally does not make or offer recommendations that are limited to proprietary products other than private offerings to qualified investors.
- **Account Minimums and Other Requirements**- SCS generally does not impose requirements to open or maintain an account/relationship, such as minimum account size or investment amount, or transactional volumes. However, the firm's clearing broker Axos Clearing may impose fees for inactivity or maintenance of certain illiquid positions which can be passed on to client accounts. In cases of dormant or inactive accounts, the firm will periodically reach out to clients by telephone or in writing to discuss available options.

Conversation Starters – Ask your financial professional these questions to learn more:

- *Given my financial situation, should I choose a brokerage 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?*

For additional information, Prospective or existing clients may review the firm's website at spartancapital.com or by calling our offices at (877) 772-7818 or 212 293-0123.

What fees will I pay?

Conversation Starter –

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?

The firm's customers will generally pay a commission charge on a per-transaction basis for equity and options trades. Regarding fixed income trades, customers will typically pay a markup or markdown percentage as its related to the prevailing market price from which the firm acquired such security. Commissions and markups and markdowns are variable typically range from 0-5% of the gross amount of the trade, and can be negotiated, based on factors including but not limited to; the client's trading frequency, the account and or transaction size, the product traded, and the liquidity or available market for the given product. There are Clearing broker fixed fees such as ticket charges, postage, and handling, which are assessed at the firm level, which is in addition to the gross commission charges

to the client. If the client trades in the same security on the same side of the market multiple times on the same day, the trades fees will usually be combined as a single transaction fee. Applicable fees, when applied, will be disclosed on trade confirmations, and can be discussed at any point in the trade lifecycle.

Potential conflicts of interest: Investors who are engaging in an active trading strategy based on their risk tolerance and investment objectives by trading more frequently than other customers, will incur higher commission charges. This creates an incentive for the firm to encourage an investor to trade often and, therefore, a conflict of interest for SCS and its registered representatives. Customers will pay fees and costs whether they make or lose money on their investments. Commissions and fees are expenses to customers, which will reduce any amount of money clients earn from their investments and assets over time. It's important that customers understand what fees and costs they are paying. For additional information, prospective customers and existing customers may request more detailed information, such as a fee schedule from either the firm's clearing broker Axos Clearing or SCS directly.

What are our legal obligations to you when providing recommendations? How else does our firm make money, and what conflicts of interest do we have?

When we provide you with a recommendation, we are required to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates conflicts between SCS and the registered representatives with your best interests. You should understand and ask us about these conflicts because they can impact the recommendations we provide you.

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

Here is an example to help you understand what this means:

During market volatility, your broker may recommend engaging in an active trading strategy that includes the selling and buying of securities based on short term events or sector-related market events. Since the broker and firm will generate additional commission revenue if the client follows these recommendations, a conflict exists in this scenario as compared to engaging in a buy and hold strategy which would not generate additional commission revenue.

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How do our financial professionals make money?

SCS financial professionals are compensated based on commissions generated from transactions entered into by their clients. Financial professionals may start out receiving a salary and draw or be subsidized by more senior brokers by way of cash and non-cash compensation. Factors such as the number of clients each broker works with, and those clients' assets available for investing the time and complexity required to meet a client's needs, the product sold (i.e., variable compensation); levels of product sales and commissions, revenue the firm earns from the financial professional's recommendations are all relevant and material factors in how much a representative will earn.

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

Answer: Yes.

You can visit Investor.gov/CRS for a free and simple search tool to research our firm and financial professionals.

Conversation Starter –
As a financial professional, do you have any disciplinary history? For what type of conduct?

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Conversation Starter –
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 this person is treating me?