

**ARBOR CAPITAL MANAGEMENT**  
**CLIENT RELATIONSHIP SUMMARY**

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[Arbor Capital Management](http://www.arborcapitalmgt.com) ([www.arborcapitalmgt.com](http://www.arborcapitalmgt.com)) is registered with the U.S. Securities and Exchange Commission (“SEC”) ([www.sec.gov](http://www.sec.gov)) as an Investment Adviser. Brokerage and investment advisory services and fees differ. It is important for a retail investor to understand the differences. There are free tools available for investors to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS). This site also provides educational materials about broker-dealers, investment advisers, and investing.

**WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?**

Arbor offers investment advisory services to retail investors. These services include advice primarily on equity securities, exchange traded funds, corporate debt securities, municipal securities, investment company securities. Our firm offers advisory services such as portfolio management, selection of other investment advisors, and consulting. Our service includes ongoing monitoring of your investment portfolio when you have entered into an Investment Advisory Agreement with us. Arbor will manage your account on either a discretionary or non-discretionary basis. Discretionary basis means that we will be authorized by you to make investment recommendations for your account and will buy and sell the securities we have recommended to you. Non-discretionary basis means you as the investor make the ultimate decision whether to purchase or sell the securities recommended to you. Arbor does not limit our advice to a limited menu of investments. We generally require a minimum of \$500,000 to open and maintain an advisory account. This minimum account size is negotiable under certain circumstances. For more detailed information about our services, refer to our [Form ADV 2A](http://advisorinfo.sec.gov/firm/summary/106461) ([advisorinfo.sec.gov/firm/summary/106461](http://advisorinfo.sec.gov/firm/summary/106461)).

**QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL**

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- *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?**

**Description of Principal Fees and Costs:** Arbor is compensated for portfolio management services based on an asset-based fee calculated as a percentage of the market value of the assets. Clients are billed in advance on a quarterly basis, and fees are pro-rated. Clients will be charged at the rate set forth in their investment management agreement. Assets Under Management (AUM) fees range from .50% to 1.00% annually. Fees are negotiable. When you are charged an asset-based fee, the more assets there are in your account, the more you will pay in fees, and Arbor therefore has an incentive to encourage you to increase the assets in your account.

Additionally, Arbor charges an hourly fee or a flat fee for consulting services. Clients are charged an hourly fee of \$100 to \$250 per hour for consulting services which shall be due and payable upon completion of the services rendered. The services and fees are specified in an agreement between you and Arbor. In certain circumstances, Arbor will negotiate terms for consulting services with clients on a case by case basis. Fees are determined based on the nature of the services being provided and the complexity of each client’s circumstances.

**Description of Other Fees and Costs:** Arbor’s investment advisory fees are separate and distinct from the fees and expenses that are charged by other advisors (mutual funds and/or ETFs), custodians, and brokers. Other fees charged to you that are related to your account are fees to the custodian, fees related to mutual funds, ETFs, and transactional fees.

**Additional Information:** 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. The fees for investment advisory services are described in further detail in our firm’s ADV, in particular, Part 2A brochure, Items 5.A., B., C., and D.

## ***QUESTIONS TO 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 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.*

When you are charged an asset-based fee, the more assets there are in your account, the more you will pay in fees. It will benefit Arbor to recommend that clients increase the assets managed by Arbor.

Arbor receives business consulting and professional services from one of their primary custodians. Additionally, this primary custodian pays or reimburses expenses (including travel, lodging, and meals expenses) for the firm's personnel to attend conferences or meetings relating to the program or to Fidelity's adviser custody and brokerage services, thus creating an incentive for Arbor to recommend this custodian to retail investors.

For more detailed information regarding conflicts of interest, please see our Form ADV, Part 2A brochure.

## ***QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL***

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

### **HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

Our financial professionals are paid a salary and other non-cash compensation in the form of an employee benefits package. Our financial professionals earn compensation based on exceptional client service, retaining client relationships, developing new client relationships and the overall financial results of the firm. The factors which affect how much our financial professionals are paid include the revenue received by the firm for financial advisory services conducted by all financial professionals.

### **DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?**

No, Arbor does not have any legal or disciplinary history to report. Please see [Investor.gov/CRS](http://Investor.gov/CRS) for a free search tool to research Arbor and our Financial Professionals.

## ***QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL***

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

### **ADDITIONAL INFORMATION**

You may also find additional information about Arbor and your Financial Professional on the [SEC's Investment Adviser Public Disclosure](http://SEC's Investment Adviser Public Disclosure) website ([advisorinfo.sec.gov/firm/summary/106461](http://advisorinfo.sec.gov/firm/summary/106461)). Please call us at 716-446-9111 for up-to-date information about our services or to request a copy of our relationship summary.

## ***QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL***

- *Who is my primary contact person?*
- *Is he or she a representative of an investment adviser?*
- *Who can I talk to if I have concerns about how this person is treating me?*