



Form CRS Relationship Summary  
March 27, 2025

<b>Item 1. Introduction</b>	<p>Topturn Capital, LLC is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ. It is important for you to understand the differences. Free and simple tools to research firms and financial professionals are available at <a href="http://www.investor.gov/CRS">www.investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers and investing.</p>
<b>Item 2. Relationships and Services</b>	<p><b>What investment services and advice can you provide me?</b></p> <p>We offer investment management, wealth management, financial planning and consulting services to retail investors. We provide investment advisory services utilizing a variety of resources, such as independent investment managers, exchange traded funds (“ETFs”), and individual debt and equity securities. Additionally, we may recommend other investment advisors and investments in private placement securities such as debt, equity and/or pooled investment vehicles to clients who are deemed “accredited investors” as defined in Rule 501 of the Securities Act of 1933. Our recommended allocation among investment alternatives is based on your investment objectives, risk tolerance, and other factors.</p> <p>Under our Investment Management Services program, we are responsible for monitoring your account(s) at least quarterly or more often as market conditions warrant. We also conduct reviews with you at least annually. For those clients to whom we provide financial planning and/or consulting services, reviews are conducted on an “as needed” basis. Our investment advisory services are offered on both a discretionary and non-discretionary basis. If you provide written authorization for us to trade on a discretionary basis, we do not need advance approval from you to determine the type and amount of securities to be bought/sold for your account(s). If you elect to have your account managed on a non-discretionary basis, we must have your approval to execute each transaction. We generally require a minimum investment of \$1,500,000 to open an advisory account but reserve the right to waive this minimum when we deem appropriate.</p> <p><i><b>For additional information,</b> please refer to our <a href="#">Form ADV Part 2A</a> “Types of Clients,” “Advisory Business,” “Review of Accounts,” and “Investment Discretion.” This is available upon request at no charge.</i></p> <p><b>Conversation Starters:</b></p> <ul style="list-style-type: none"><li>● <b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li><li>● <b>How will you choose investments to recommend to me?</b></li><li>● <b>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</b></li></ul>
<b>Item 3. Fees, Costs, Conflicts, and Standard of Conduct</b>	<p><b>What fees will I pay?</b></p> <p>If you elect to invest with us in an investment management program, you will pay fees based upon the market value of the account. Fees are charged in advance on a quarterly basis based upon the market value of the account on the last day of the quarter. A detailed schedule of the range of fees that will be charged is included in the <a href="#">Form ADV Part 2A</a>. We may charge a fixed fee for financial planning and consulting services. You may elect to use the services of an independent manager that we may recommend. If you choose one of these managers, the fee that they charge will be exclusive of Topturn’s fees. We only offer non-wrap programs and as such, you should be aware that you will pay additional fees that are charged by the executing broker-dealer. These fees include custodial fees, reporting charges, margin costs, transaction and execution fees.</p> <p>Other fees and costs associated with your advisory services and investments might include charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund’s prospectus.</p> <p>The more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account.</p> <p>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.</p>

**For additional information**, please review our [Form ADV Part 2A](#), Section “Fees and Compensation.” A copy of [Form ADV Part 2A](#) will be provided free of charge upon request.

**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?

**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.

For example, because we permit our employees to maintain personal securities accounts. Advisory representatives and employees may trade in a security you own or is considered for purchase or sale for you but are under no obligation to initiate the same transaction or recommendation for you. We have adopted policies and procedures that are intended to address these conflicts of interest. Our employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Also, some of the supervised persons of Topturn are licensed insurance agents and a conflict exists when the purchase of an insurance product is recommended to an advisory client. We have procedures in place whereby we seek to ensure that all recommendations are in your best interest.

**Conversation Starter:**

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

**For additional information**, including other conflicts that aren’t specifically mentioned here, please refer to sections “Fees and Compensation,” “Performance Based Fees,” and “Other Financial Industry Activities and Affiliations” in our most recent [Form ADV 2A](#) filing which can be obtained, free of charge, by request.

**How do your financial professionals make money?**

Our financial professionals are compensated by receiving a salary and are eligible for ongoing bonuses that are tied to the overall productivity of Topturn Capital LLC. The more fees that they generate, the more they are compensated.

**Item 4.  
Disciplinary  
History**

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

No. A free and simple search tool to research us and your financial professionals is available at [www.investor.gov/CRS](http://www.investor.gov/CRS).

**Conversation Starter:**

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

**Item 5.  
Additional  
Information**

If you would like additional or up-to-date information or a copy of this disclosure, please call 831-324-0481 or visit our website at [www.topturncapital.com](http://www.topturncapital.com).

**Conversation Starter:**

**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?**

We updated our Client Relationship Summary on March 27, 2025. Below you will find a summary of the changes made since our previous filing in March 2024.

Section Heading	Summary of Change
Item 2. Relationships and Services	Added: “We may recommend other investment advisors”