

Pinnacle Investments is registered with the Securities and Exchange Commission as both a Broker-Dealer (“BD”) and Registered Investment Adviser (“RIA”). Pinnacle Investments is a member firm of FINRA, MSRB and SIPC. Pinnacle Investments offers both broker-dealer and investment advisory services. These services and their fees differ, so it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing. Please see “Regulation Best Interest Disclosure” on pinnacleinvestments.com/disclosures for more information our responsibilities to you and other relevant disclosures.

What investment services and advice can you provide me?

Pinnacle Investments offers both brokerage and investment advisory services to retail investors. Below is a summary of the main types of services we offer and their features. Additional information and disclosure can be found at www.pinnacleinvestments.com/disclosures.

	Brokerage (commission based)	Investment Advisory (fee-based)
Services	Pinnacle Investments offers brokerage services, including buying and selling securities on either an agency or principal basis. Our professionals offer securities recommendations, margin, securities-based lending, check writing and debit card services	Pinnacle Investments offers the following advisory services: investment advisory services on a discretionary and nondiscretionary basis for individuals and/or small businesses, selection of other advisers, financial planning, and investment advice through consultation. Margin, securities-based lending, check writing and debit card services are also available to advisory clients.
Monitoring	We do not offer or provide monitoring services for your brokerage account.	Pinnacle Investment’s advisors, when acting as investment adviser representatives (IARs), review retail investors investments as part of our standard services.
Investment Authority	Pinnacle Investments typically does not have investment authority over brokerage accounts. Our professionals may offer securities recommendations to you, but you will always make the decision whether to follow any recommendation.	Pinnacle Investments, when acting as an investment adviser, accepts discretionary authority for most accounts. This means that we place trades in your account without your prior approval, in order to carry out an agreed investment program. Investors can place limitations on the types of securities in their account through a written request. Pinnacle Investments also offers non-discretionary advisory accounts where the IAR will make recommendations and give advice, but you have the final decision.
Account minimums	There are no minimums to open a brokerage account with Pinnacle Investments, LLC.	Most advisory programs have minimum account size requirements. For more information, please see our Form ADV.
Limited Investment Offerings	Pinnacle Investments does not offer a limited menu of products or types of investments. Regardless of the products Pinnacle Investments’ representatives offer our representatives act in the best interest of the client.	Pinnacle Investments offers advice on both proprietary as well as non-proprietary products. Pinnacle Investments does not offer a limited menu of products or types of investments. Regardless of the products Pinnacle Investments’ representatives offer our representatives act in the best interest of the client.

Conversation Starters:

- **Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?**
- **How will you choose investments to recommend me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

What fees will I pay?

Brokerage (commission-based)	Investment Advisory (fee-based)
<p>Pinnacle Investments, when acting as a broker-dealer, is paid for each transaction in your account. This is true whether we act as your agent, on your behalf, in the transaction; or whether we act as a principal, using our own account to sell securities to you or buy them from you.</p> <p>The primary form of charging your account in an agency transaction is via transaction-based commissions. The primary form of charging your account in a principal transaction is via markups/markdowns on your transactions.</p> <p>A retail investor would be charged more when there are more trades in his or her account, and therefore our firm may therefore have an incentive to encourage a retail investor to trade often.</p> <p>Additional costs associated with a brokerage account could include:</p> <ul style="list-style-type: none"> • Upfront or ongoing fees associated with a Mutual Fund purchase • Handling and processing fees on each transaction • Margin interest <p>Please refer to Standard Commission Rates and Schedule of Fees (First Clearing)</p> <p>Both documents can be found at pinnacleinvestments.com/disclosures</p>	<p>Pinnacle Investments charges asset-based fees. That is, we charge a percentage of the dollar value of your account each billing period. As such the more assets there are in a retail investor’s advisory account, the more a retail investor will pay in fees, and Pinnacle Investments may therefore have an incentive to encourage retail investors to increase the assets in his or her account. Pinnacle Investments offers both non-wrap and wrap fee accounts.</p> <p>In a non-wrap account there could be additional fees associated with the account that are above the asset-based fee. This could include transaction fees and postage fees. These and other fees may be waived based on individual circumstances.</p> <p>In a wrap fee program the asset-based fees associated with the wrap fee program will include most transaction costs and fees and are therefore could be higher than typical asset-based advisory fees.</p> <p>Certain programs or account types may charge additional fees for other services.</p> <p>For more details, please see our Form ADV, Item 5 which can be found at pinnacleinvestments.com/disclosures</p>
<p>If you are unsure which documents apply to your account please reach out to ADV@Pinnacle-LLC.com</p>	

In both brokerage and investment advisory accounts, in addition to the fees that you pay to us, certain investment products contain built-in fees and expenses as described in that product’s offering material. Note, if your account is a margin account and you have an outstanding balance, you will pay margin interest.

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. Please see our [Form ADV, Item 5](#), and brokerage fee schedule at pinnacleinvestments.com/disclosures

Conversation starters:

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 providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts do you have?

When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you. Here are some examples to help you understand what this means:

<p><u>Employee vs. Client Conflicts:</u> The compensation arrangements or incentives for the firm or its employees could affect whether employees recommend or offer a particular security or transaction to a client.</p>	<p><u>Outside Business Activities:</u> If your Registered Representative or IAR engages in an outside business activity it can cause a conflict of interest. Typically, this may occur if the Registered Representative or IAR engages in an outside business activity relating to a stock offering for another company, the IAR may have an incentive to recommend that investment to you.</p>
<p><u>Brokerage Transaction:</u> Pinnacle Investments is required to provide clients with the best execution possible for their transactions. An appearance of a conflict of interest may occur if a broker-dealer or investment adviser directs transactions to a certain market center that may not provide clients the best possible execution price on their transactions.</p>	<p><u>Front Running:</u> Front Running is not only a conflict of interest but also a prohibited act. This situation results when a broker or advisor takes advantage of non-public information about a large block trade and purchases or sells the securities in his or her own account ahead of the block execution.</p>
<p><u>Proprietary Products:</u> Investments that are issued, sponsored or managed by Pinnacle Investments or our affiliates. We therefore have a financial incentive to recommend proprietary products over third-party products.</p> <ul style="list-style-type: none"> • <u>Confidential Planning Corporation</u> Confidential Planning Corporation is an insurance agency. • <u>Pinnacle Capital Management (PCM)</u> Pinnacle Capital Management is an affiliated RIA under common ownership. PCM is available as a sub adviser option for Pinnacle Investments 	<p><u>Dual Registration – Investment Advisor/ Broker Capacity:</u> Pinnacle Investments is both an SEC registered investment adviser and a registered broker-dealer. As such it is able to act in an advisory capacity and have managed accounts as well as act in a brokerage capacity and maintain brokerage accounts. It is important that the broker or advisor is clear on that role when engaging with a client.</p>

<p>advisory clients.</p> <ul style="list-style-type: none"> • <u>1789 Growth and Income Fund</u> The 1789 Growth and Income Fund is a 40 Act Mutual Fund that seeks income and growth of capital by investing primarily in stocks with high and growing dividends. Pinnacle Investments is the distributor for the Fund and Pinnacle Investments' affiliate Pinnacle Capital Management is the Advisor to the Fund 	
<p>Principal Trading: Investments that Pinnacle Investments buys from a retail investor and/or investments that Pinnacle Investments sells to a retail investor, for or from our own accounts, respectively.</p>	<p>Sponsorship: From time to time a custodian or fund company will provide monetary support to Pinnacle Investments to be directed to events related to their product. These events could be for employees of Pinnacle Investments or for clients.</p>

Conversation Starter:

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

Additional Information: For our statement on Conflicts of Interest please see pinnacleinvestments.com/disclosures

How do your financial professionals make money?

- Pinnacle Investments' financial professionals make money when acting as a broker in the form of commissions for agency transactions and markups/downs for principal transactions.
- Pinnacle Investments' financial professionals make money when acting as an advisor in the form of a pre-agreed upon fee that they charge a retail investor for assets under management.
- Pinnacle Investments' financial professionals are compensated based on factors such as: the amount of client assets they service; the time and complexity required to meet client's needs; product sales commissions; and revenue the firm earns from the financial professional's advisory services or recommendations.

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

Yes, retail Investors should visit Investor.gov/CRS for a free and simple search tool to research Pinnacle Investments and our financial professionals.

Conversation Starter

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

5. Additional Information:

A retail investor can find additional information about our brokerage or investment advisor services and request a copy of our relationship summary. This information can be found at www.pinnacleinvestments.com/disclosures. Retail investors can request a copy of the relationship summary at (315) 251-1101.

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?**