

**Item 1 - Introduction:** Alcosta Capital Management, Inc. (“Alcosta”) is an SEC-registered investment adviser that provides 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 [invest.gov/CRS](http://invest.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2 – Relationship Services**

*What investment services and advice can you provide me?*

We offer investment advisory services to retail investors. As part of these services, we manage individual client accounts on a discretionary basis. We offer a number of model portfolios with different risk characteristics: Growth, Growth & Income and Balanced. We also provide financial planning, which is available upon a client’s request and/or at our discretion. There is no extra fee charged for financial planning. For more information about these services please see Item 4 of our ADV Part 2A Brochure, available [here](#).

Monitoring	Alcosta personnel review client accounts on an ongoing basis and no less frequently than quarterly. An account review is also triggered upon receipt of information material to the management of the portfolio or upon client request.
Investment Authority	Alcosta has discretionary authority to manage accounts on behalf of our clients. This allows us to determine the securities to be bought or sold in your account and the amount of those securities, the broker or dealer to be used for purchase or sale of securities for a client’s account, and the commission rates to be paid to a broker or dealer for a client’s securities transactions. You should note that we have full discretion to determine when your assets are invested, both when we begin to manage your account and upon receipt of additional contributions to your account. For non-discretionary accounts of retail clients, the client makes the ultimate decision regarding the purchase or sale of securities.
Investment Offerings	We do not currently limit our advice to proprietary products, or a limited menu of products or types of investments.
Requirements	We impose a minimum account size of \$500,000, which we may waive at our sole discretion.

For additional information, see Items 4 and 7 of our ADV 2A Brochure, available [here](#).

Key questions to ask:

- 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?

**Item 3 – Fees, Costs, Conflicts, and Standard of Conduct**

*What fees will I pay?*

Alcosta charges advisory fees based on a percentage of a client’s assets under management. Our fees vary depending on the model portfolio and the value of a client’s assets managed according to that model. The Growth portfolio ranges from a 1.10% to 2.00% fee, and the Growth & Income and Balanced portfolios range from a 1.00% to 1.85% fee. All fees are payable quarterly in advance and are due on the first day of the calendar quarter as stated in our agreement with you. The more assets there are in your advisory account, the more you will pay in fees; thus, the firm has an incentive to encourage you to increase the assets in your account. The fees you pay to us do not include the fees and expenses charged to you by the following: fees and expenses charged by mutual funds, ETFs or other investment pools to their shareholders, fees charged by third party money managers, administrative fees and other operational related

fees and expenses; commissions or transaction costs charged by your custodian or the executing broker we may select when purchasing or selling securities; and custody and related administrative fees charged by broker dealers and custodians.

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. For additional information, please see Item 5 of our ADV 2A Brochure, available [here](#).

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? 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 do 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 is an example to help you understand what this means. As part of our arrangement with large broker-dealers we have access to products and services that can assist us in managing and administering your account(s). These include, but are not limited to research, educational conferences, practice management resources, and access to consultants. Thus, a conflict of interest exists as we have an incentive to select a broker-dealer that offers these services. We review our relationship with broker-dealers and the associated costs to you as part of our obligation to act in your best interest. For more information about our conflicts, please see Item 10 and 12 of our ADV Part 2A Brochure, available [here](#).

*How do your financial professionals make money?*

We receive cash compensation for the advisory services we provide to you. This compensation comes from your asset-based fee.

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

#### **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 our financial professionals is available at [investor.gov/CRS](http://investor.gov/CRS).

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

#### **Item 5 – Additional Information**

Additional information about our investment advisory services and an up-to-date copy of the relationship summary is available by contacting us at 888-267-6729 or contacting the Chief Compliance Officer, Erick Ormsby, at [eo@alcostacapital.com](mailto:eo@alcostacapital.com).

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?