



## Gulfstream CM, LLC Client Relationship Summary -- March 30, 2024

### 1. Introduction

Gulfstream CM, LLC ("Gulfstream" or the "Adviser") is registered with the U.S. Securities and Exchange Commission (the "SEC") as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

### 2. Relationships and Services

***What investment services and advice can you provide me?*** Gulfstream offers investment advisory services to retail investors on a discretionary basis. Our investment management agreement with you gives us the authority to buy and sell securities on your behalf according to your investment strategy. The principal investment advisory services that Gulfstream offers to retail investors are through separately managed accounts ("accounts"). Gulfstream provides ongoing monitoring of your investments in your accounts. Monitoring your investments is offered as part of our standard investment advisory services. Our investment strategies are predominantly in fixed income municipal bonds, therefore the investment advice Gulfstream offers is specific to municipal bonds. We generally require a minimum account size of \$1 million to open an account with us. The Adviser reserves the right in its sole discretion to waive account minimums. ***Please see the more detailed disclosure on the investment services and advice that we can provide to you in Items 4 and 7 of our Form ADV Part 2A, which is available here Gulfstream CM LLC's Form ADV.***

**Conversation Starters. Ask your financial professional-**

- *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?*

### 3. Fees, Costs, Conflicts, and Standard of Conduct

***What fees will I pay?*** You will pay us an asset-based fee ranging from .30% to .40% of the net value in your account (including net unrealized appreciation or depreciation of investments and cash, cash equivalents and accrued interest) each year for managing your account. Because we charge an asset-based fee, this creates a conflict of interest because the more assets there are in your advisory account, the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account. You may also pay other fees and costs including custodian fees, brokerage fees, commissions, interest fees, taxes, transfer and registration fees, account maintenance fees, money market fund fees, product-level fees, professional expenses relating to your investment including legal, accounting, audit, research expenses, investment expenses and other transactional fees. 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 the more detailed disclosure on our fees and costs in Items 5.A., B., C., and D of our Form ADV Part 2A, which is available here Gulfstream CM LLC's Form ADV.***

**Conversation Starters. 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 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. The following arrangements and activities give us an incentive to make investments for you based on our own interests rather than on your needs.

- ***Other Fees and Expenses.*** A supervised person of the Adviser indirectly receives compensation in connection with the sale of securities or other investment products, because such person is also majority owner and sole Managing Member of

Mountainside Securities LLC (“Mountainside”), an SEC-registered broker-dealer that effects a significant number of the securities transactions for the Adviser for the benefit of the Adviser’s clients. As a result of this additional compensation, the Adviser’s supervised person has a conflict of interest because the Adviser’s supervised person has an incentive to recommend these securities or other investment products based on the compensation received, rather than on your needs.

- *Revenue Sharing.* We have entered into an agreement with our affiliate, Mountainside, whereby Mountainside will receive a solicitation fee from the Adviser for accounts Mountainside or one of its representatives has referred to the Adviser for investment advisory services. This solicitation fee consists of a percentage of all fixed fees paid to the Adviser by investors Mountainside or one of its representatives has referred. This solicitation fee will be paid to Mountainside by the Adviser out of the normal fixed fees the Adviser receives from clients. No additional charges or costs are incurred by you by virtue of you having been introduced to the Adviser by Mountainside. A disclosure statement is provided to investors Mountainside has referred to the Adviser. This creates an incentive for Mountainside to recommend our investment advisory services.
- *Side-by-Side Management.* When the Adviser and its investment personnel manage more than one client account, the Adviser’s receipt of performance-based compensation (or higher fees) from certain client accounts but not others creates an incentive for us to favor such client accounts and to disproportionately allocate time, services or functions to these client accounts.
- *Personal Trading.* We invest personally in the same (or related) securities that we recommend to you. We may also buy or sell securities for you at or about the same time that we buy or sell the same securities for our own accounts. This may adversely affect the price at which your trades are executed because we have an incentive to place our trades before or after client trades are executed in order to benefit from any price movements due to the client’s trades.

**Conversation Starters. Ask your financial professional-**

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

*Please see the more detailed disclosure on our conflicts of interest in Items 5, 6, 10, 11, 12, 14, and 17 of our Form ADV Part 2A, which is available here [Gulfstream CM LLC's Form ADV](#).*

***How do your financial professionals make money?*** We pay our financial professionals the following compensation: General Partners are paid a portion of the management fee and incentive fee after expenses of the Adviser are paid. Portfolio managers are paid a salary and a portion of the account management fees. Financial professionals who market on behalf of the Adviser receive a portion of the account management fees. Financial professionals whose job functions encompass compliance, operations and due diligence are paid a salary plus annual bonus. Bonuses are based on the overall performance of the Adviser.

#### **4. Disciplinary History**

***Do you or your financial professionals have legal or disciplinary history?*** Yes. Gulfstream CM, LLC and Gulfstream GP, LLC were named as defendants in a multi-party civil suit filed in the Superior Court of New Jersey, Essex County, Law Division. The action centers on the personal conduct of a former managing member and co-founder of the Adviser, performed well outside the scope of his employment. The former managing member and co-founder is no longer a member of the Adviser and has no involvement in the operations, management or governance of the Adviser. While the complaint consists of 14 claims, only one is asserted against the Gulfstream entities. That claim alleges negligence in respect of the former member’s conduct and in no way relates to the investment activities or business of the Adviser. The Gulfstream entities were served with the complaint on November 8, 2019. The Gulfstream entities believe the claim lacks factual or legal basis and intend to seek dismissal. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Conversation Starters. Ask your financial professional-**

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

#### **5. Additional Information**

You can find additional information about our investment advisory services on the SEC’s website. You can request up to date information and a copy of our relationship summary by contacting us at 908-918-1600.

**Conversation Starters. Ask your financial professional-**

- *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?*