

# Cribstone Capital Management

## Form CRS: Customer Relationship Summary

March 1, 2021

Cribstone Capital Management (Cribstone) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you as a retail investor to understand these differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker dealers, investment advisers, and investing.

---

### *What Investment services and advice can you provide me?*

---

Cribstone provides a variety of investment advisory services, including comprehensive financial planning, discretionary and non-discretionary investment management, and consulting and/or investment management services to non-profit clientele and qualified retirement plans. The majority of Cribstone's wealth management clientele have provided us written authority to manage their accounts at our discretion.

As part of our planning process, we typically play an active role, working alongside external CPAs and Attorneys, in the formulation and management of both estate and tax strategy, and provide advice on charitable giving.

---

### *Monitoring of Affairs*

---

Cribstone develops financial plans with our clientele, including the development of risk models, and reviews investment accounts as part of our ongoing supervisory process. We typically contact investment advisory clientele at least semi-annually, and provide quarterly assessments of holdings, risk allocations, and performance, including an update on Cribstone's views of the economy and investment landscape.

---

### *Investment Offerings*

---

Our investment advice is not limited to a specific type of product, and the majority of investment management accounts that we manage consist of individual equity and debt securities, exchange traded funds (ETFs), and mutual funds.

---

### *Account Minimums*

---

Cribstone works with a wide variety of individuals, families, and organizations. While the average scope of the relationships that we manage is approximately \$1M, we do not place any minimums size requirements on the scale of relationships that we will work with.

---

### *Brokerage and Insurance*

---

Scott Upham is a registered representative of Purshe Kaplan Sterling Investments, Inc. (PKS) a broker-dealer, and is licensed as an insurance agent with a small group of insurance companies. Securities transactions and insurance product sales are outside the scope of Cribstone's advisory services. Upham's relationship with PKS exists solely for him to remain connected to legacy broker-dealer accounts and he is not actively engaged in the creation of any new broker-dealer relationships.

---

## *What fees will I pay?*

---

If you open an advisory account, you will pay an ongoing asset-based fee at the beginning of each quarter for our services, based on the value of the cash and investments in your advisory account. Cribstone's fee schedule is described in detail in our Form ADV, but fees begin at 1% for accounts less than \$1M, and decline as the scale of the relationship increases. If your balance changes by more than \$10,000 during that quarter, we will recalculate and adjust the fee.

Cribstone invests in mutual funds, exchange traded funds, individual debt or equities securities. These same assets may also be subject to other fees and expenses charged by the funds, as set forth in the prospectuses of those funds. Most accounts that Cribstone manages are held at Charles Schwab. Schwab's fees may include transaction fees to execute trades, custodial fees, margin costs, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on their accounts and securities transactions. As a fiduciary, Cribstone has responsibility to ensure that you are always receiving the best execution and trading cost efficiency. For accounts typically in excess of \$400,000, Cribstone will most often utilize institutional share class mutual funds. For smaller accounts, we may use Class A shares in order to minimize trade execution costs from Schwab.

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 Form ADV, Part 2A Items 5.A., B., C., and D and other applicable.

More information on your fee schedule can be found at [www.CribstoneCapital.com](http://www.CribstoneCapital.com)

## *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 do so with a fiduciary responsibility. We must always 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.

(1) Since Cribstone charges asset-based fees, the greater the assets in your account, the more you will pay in fees, and Cribstone may therefore have an incentive to encourage you to increase the assets in your account. (2) Cribstone generally recommends Schwab to serve as custodian for our clients. Schwab provides Cribstone with "institutional platform services." The institutional platform services include brokerage, custody, software and other technology and related services that assist Cribstone in managing and administering clients' accounts including assistance with back office functions, recordkeeping and client reporting.

---

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

---

The financial professional employees of Cribstone are paid a salary and discretionary bonus. They do not receive commission for sales of any products. Our financial professional's compensation is based on such factors as the amount of client assets they service, the time and complexity of a client's needs, overall firm revenues, and contributions to the overall running of Cribstone. We do not make money or pay our employees based on buying or selling specific products for you as a client.

There is a potential conflict of interest for our employees in that they may get paid more if they work with a larger number of more complex clients. Larger demands on a financial professional's time may limit the amount of time they can devote to you as an individual client.

---

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

---

No. Cribstone and its professionals have not had any disciplinary history. Retail investors can visit [Investor.gov/CRS](http://Investor.gov/CRS) for free and simple search tool to research Cribstone and our financial professionals.

---

### *Suggestions for you: Things to ask your financial advisor*

---

- As a financial professional, do you have any disciplinary history? Please explain?
- Who will I be working with? Does your firm operate as a team or will I work with one individual?
- If I am disappointed with the individual I am working with, or service that I am experiencing, who do I talk with?
- Can you give me an example of how fees impact my account?
- Should I engage with an investment advisor or a broker-dealer? What's the difference?
- Tell me about the experience of your team? Are you likely to add more staff? How will that impact me?

Additional information on Cribstone can be found at our website [www.CribstoneCapital.com](http://www.CribstoneCapital.com) or by calling 207-844-2000. You are able to request up to date information and a copy of the Client Relationship Summary (CRS) by calling or emailing [tina@cribstonecapital.com](mailto:tina@cribstonecapital.com).