

**Client Relationship Summary**  
**Full Sail Capital, LLC (CRD# 291368)**

## Introduction

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Our firm, Full Sail Capital, LLC, is registered as an investment adviser with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## Relationships and Services

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

**Services:** We offer investment advisory services to retail investors. These services include investment management, financial planning, estate plan consulting and family office services. As part of these services, we work closely with you to identify your investment goals and objectives, as well as your risk tolerance and financial situation in order to develop an appropriate investment approach.

**Accounts, Investments, and Monitoring:** We provide services to those with individual, joint, retirement, business, trust and estate accounts. We primarily use exchange-traded funds, individual debt and equity securities, independent managers and mutual funds in constructing portfolios. Less frequently, we also recommend that certain eligible Clients invest in privately placed securities, which may include real estate, debt, equity and/or interests in pooled investment vehicles. We do not make available or offer advice for only proprietary products or a limited menu of products or types of investments. As part of our services, we monitor portfolios and securities in accounts on a regular and continuous basis. We also offer to meet with you at least annually, or more frequently, depending on your needs.

**Investment Authority:** We provide our services on a discretionary basis. We execute investment recommendations in accordance with your investment objectives without your prior approval of each specific transaction. We also offer our services on a non-discretionary basis, which means we are required to obtain your consent prior to executing any trades in your accounts. Therefore, you will make the ultimate decision regarding the purchase or sale of investments in your accounts. However, we may not be able to aggregate your order with other client orders under this type of authority and therefore you may not receive the same price as other clients. Our engagement will continue until one party notifies the other in writing.

**Account Minimums & Other Requirements:** We require a relationship size minimum of \$1,000,000 in order for you to open/maintain an account or establish a relationship. However, we may reduce our minimum relationship size based upon certain criteria (i.e. additional assets, anticipated future earning capacity, related accounts, or negotiations with the client).

**Additional Information:** For more detailed information on our relationships and services, please see Item 4 – Advisory Services, Item 13 – Review of Accounts and Item 7 – Types of Clients of our Form ADV Part 2A. Part 2A is available via our firm’s [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *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?*

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

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### What fees will I pay?

**Asset-Based Fees:** Our asset-based fees for wealth management range from 0.50% to 1.00% annually based on a tiered schedule. This fee is collected on a monthly basis and calculated as a percentage of the market value of the average daily account balance in your account[s] during that month. This presents a conflict of interest as we are financially incentivized to encourage you to place more assets in your advisory account[s] as you will ultimately pay more in advisory fees if the balance of the account[s] increase[s].

**Other Fees & Costs:** In addition to our advisory fee, you will also be responsible for any third party manager fees, if applicable, platform fees, applicable custody fees, account administrative fees, fees and expenses related to exchange-traded funds and mutual funds and applicable securities transaction fees.

**Additional Information:** **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 more detailed information on our fees,

please see Item 5 – Fees and Compensation of our Form ADV Part 2A available via our firm’s [Investment Adviser Public Disclosure Page](#).

**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 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 interests 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.*

We will recommend that you open your account with a specific custodian, where we maintain an institutional relationship and receive certain support and benefits as detailed in our ADV. The receipt of such support and benefits presents a conflict of interest and can influence our recommendation of the custodian to you. However, you ultimately decide where to open your accounts. Choosing a different custodian may result in a reduction in the of quality of service and/or ability to obtain favorable prices through the custodian you choose.

**Additional Information:** For more detailed information, please see Item 10 – Financial Industry Activities and Affiliations, Item 12 – Brokerage Practices and Item 14 – Client Referrals and Other Compensation of our Form ADV Part 2A available via our firm’s [Investment Adviser Public Disclosure Page](#).

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

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

Our financial professionals are either compensated based on an agreed-upon annual salary and are eligible for annual bonuses based on employee performance, or they receive compensation based on a percentage of the revenue generated from the accounts they service directly. Also, certain financial professionals are compensated based on the revenue generated from advisory services, which is distributed in accordance with our partnership agreement. This means certain financial professionals have an incentive to increase the asset size in the relationship or solicit new business, the latter of which has the potential to take time away from that individual’s day-to-day servicing of existing clients.

#### Disciplinary History

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

No. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

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

#### Additional Information

You can find additional information about our investment advisory services by viewing our Form ADV Part 2A available via our firm’s [Investment Adviser Public Disclosure Page](#) or by visiting [www.fullsailcapital.com](http://www.fullsailcapital.com). You can request up to date information and a copy of our client relationship summary by contacting us at (405) 286-2100.

**Conversation Starters:** *Who is my primary contact person? Is he or she a representative of an investment advisor? Who can I talk to if I have concerns about how this person is treating me?*