

**VCP Financial LLC** (“VCP”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for retail investors to understand the differences. There are free and simple tools available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investments advisers, and investing.

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

VCP provides portfolio management investment advisory services to retail investors, based on clients’ individual investment goals, objectives, time horizon and risk. We develop an Investment Policy Statement (“IPS”) in consultation with clients outlining each client’s financial situation used in selecting a corresponding portfolio of investments. All clients’ accounts are continuously monitored in accordance with the investment objectives established in each client’s IPS. Clients can change their investment goals and objectives based on their financial needs and impose reasonable agreed to restrictions and guidelines on their account at any time by contacting VCP. A discretionary account means, VCP buys and sells investments in the account without obtaining pre-approval, until VCP is notified in writing to switch to non-discretionary. A non-discretionary relationship means VCP seeks client approval to make the ultimate decision to purchase or sell investments. All clients sign an advisory agreement giving us this authority, which remains in place until either the client or VCP terminates the relationship. Types of securities clients own include ETFs, REITs, insurance products, government securities and related entity managed private fund.

In addition, VCP offers the following other types of advisory services:

- **Financial Planning** – Preparation of a financial plan based on a client’s financial needs.
- **Pensions Consulting** – IPS preparation, investment selection and monitoring performance.
- **Consulting** – individual advice on estate and retirement planning, financial concerns consulting.

**More detailed information about our advisory services, including minimum investment amounts, can be found in our Form ADV Part 2A (Items 4 and 7) at:**

<https://adviserinfo.sec.gov/firm/summary/167901>

**Conversation Starter**

*You are encouraged to ask a financial professional and start a conversation with the following additional questions:*

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

**What fees will I pay.**

**Portfolio Management Advisory Services – Fee Schedule**

| Assets Under Management | Annual Fee |
|-------------------------|------------|
| \$1,000,000 & Under     | 2.00%      |
| Above \$1,000,000       | 1.50%      |

All fees are negotiable, billed quarterly in advance, and debited directly from the client’s account, as authorized by client. Advisory fees are calculated on the market value of clients’ accounts, as determined on the last day of the prior quarter and held in the account established by the client-selected custodian. Clients who terminate their advisory agreement within 5 business days receive a full refund. Terminations during other periods, fees are reimbursed pro-rata based on the remaining days in the period.

**Financial Planning** – Hourly: \$100 to \$300. Fixed: \$1,000 - \$20,000. Retainer upon completion.

**Pension Consulting** – 0.25% to 0.50% annually based on the dollar amounts under advisement.

**Consulting** – Hourly: \$100 to \$300. Fixed: \$1,000 - \$20,000. Retainer balance due upon completion.

The above fees are exclusive of other fees clients may pay, such as custodian fees, account maintenance fees, transaction charges by brokers to execute transactions, mutual fund, related private fund and other product fees.

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amounts of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More detailed information about our fees and**

|   |  |
|---|--|
|   | <p>other costs can be found in our Form ADV Part 2A, including Item 5 and Item 6, a copy of which is available on the Investment Adviser Public Disclosure website at: <a href="https://adviserinfo.sec.gov/firm/summary/167901">https://adviserinfo.sec.gov/firm/summary/167901</a></p>   |
| <b>Conversation Starter</b>   | <p>You are encouraged to ask a financial professional and start a conversation with the following additional questions about the impact of fees and costs on investments:</p> <ul style="list-style-type: none"> <li>– <i>Help me understand how these fees and costs might affect my investments.</i></li> <li>– <i>If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?</i></li> </ul>  |
| <b>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?</b> | <p>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.</p> <ul style="list-style-type: none"> <li>– The more assets there are in a client's advisory account, the more a retail investor will pay in fees, and our firm has an incentive to encourage retail investors to increase the assets in his or her account or to engage in riskier investment techniques to increase the account size.</li> <li>– If we recommend that a client roll over retirement plan assets into an account managed by us, this recommendation creates a conflict of interest if we will earn an advisory fee on the rolled over assets.</li> <li>– When we recommend that a client invest in a hedge fund managed by a related entity, this creates a conflict of interest because we earn an advisory fee (the same or higher) and charge an additional performance and other types of fees that are (either collectively or in part) higher than your current management fee. Performance fees include realized fund gains. These investments are riskier and more speculative than those customarily held in retail client accounts, which are designed for experienced investors with knowledge and resources necessary to evaluate the risk of loss.</li> </ul> <p><b>More detailed information about our conflicts of interest can be found in our Form ADV Part 2A, including Item 5, Item 10, Item 12 and Item 14, which is posted on the Investment Adviser Public Disclosure website at <a href="https://adviserinfo.sec.gov/firm/summary/167901">https://adviserinfo.sec.gov/firm/summary/167901</a></b></p> |
| <b>Conversation starter</b>   | <p>You are encouraged to ask a financial professional and start a conversation with the following additional questions regarding conflicts of interest:</p> <ul style="list-style-type: none"> <li>– <i>How might your conflicts of interest affect me, and how will you address them?</i></li> </ul>  |
| <b>How do your financial professionals make money?</b>  | <p>Our financial professionals are compensated based on the distribution of the firm's total net advisory fees after expenses received by the firm during the year. The quarterly distribution of fees to financial professionals is pro-rata based on the value of clients' accounts each financial professional provides advisory services to relative to the firm's total value of assets under management.</p>   |
| <b>Do you or your financial professional have legal or disciplinary history?</b>  | <p>No. You may visit <b><i>Investor.gov/CRS</i></b> for a free and simple search tool to research us and our financial professionals.</p>  |
| <b>Conversation starter</b>   | <p>You are encouraged to ask a financial professional and start a conversation with the following additional questions about the financial professional's disciplinary history:</p> <ul style="list-style-type: none"> <li>– <i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i></li> </ul>  |
| <b>Additional Information</b>   | <p>You can find additional information about our investment advisory services in our Form ADV Part 2A, on our websites at <a href="http://www.vcpfinancial.com/">HTTP://WWW.VCPFINANCIAL.COM/</a>. You may request up-to-date Information and/or a copy of our relationship summary by calling (212) 328-7876.</p>   |
| <b>Conversation starter</b>   | <p>You are encouraged to ask a financial professional and start a conversation with the following additional questions about contacts and complaints:</p> <ul style="list-style-type: none"> <li>– <i>Who is my primary contact person?</i></li> <li>– <i>Is he or she a representative of an investment adviser or a broker dealer?</i></li> <li>– <i>Who can I talk to if I have concerns about how this person is treating me?</i></li> </ul>   |