| <u>Item 1</u> : Introduction | Telemus Capital LLC is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences between them. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing. |
|--|---|
| | |
| Item 2: What investment | We offer investment advisory services to retail investors. We provide personalized and confidential |
| services and advice can you | investment management and wealth advisory services to clients, who are primarily high net worth |
| provide me? | individuals, trusts and family offices, and also are sponsors of retirement plans, charitable |
| | organizations, municipal government entities and business entities. We and an affiliated entity |
| Conversation Starters. Ask | manage private investment funds. Our investment management services are generally provided |
| your financial professional | on a discretionary basis, though clients who invest in our affiliated private investment funds must |
| "Given my financial situation, | affirmatively elect the investment on a non-discretionary basis. After conducting a financial |
| should I choose an investment | assessment including risk analysis and developing a financial strategy in collaboration with our clients, we construct client portfolios generally in accordance with the model strategy we have |
| advisory service? Why or why | developed which is most appropriate for the client's risk profile. Our model strategies are invested |
| not?" | in some combination of individual equities, individual bonds, mutual funds, ETFs, alternative |
| "How will you choose | investments and potentially other investment products. If you utilize our investment management |
| investments to recommend to | services, you will typically give us discretionary authority to trade the assets in your account |
| me?" | through a limited power of attorney contained in your client agreement with us. We also offer our |
| "What is your relevant | services on a nondiscretionary basis, where you must approve our recommendation before the |
| experience, including your licenses, education and other | trade is placed. Clients who invest in our affiliated private investment funds must affirmatively |
| qualifications? What do these | elect the investment on a non-discretionary basis. We will monitor the holdings and performance |
| qualifications mean?" | of the investments we make for you on an ongoing basis and review your account with you at least annually. We do not have a formal investment minimum amount but retain the discretion to |
| quanjications mean. | decline any proposed client engagement that is too small to serve appropriately within our |
| | infrastructure. |
| | |
| | For additional information, please refer to our <u>ADV Part 2A brochure</u> ('Brochure"), especially <u>Item</u> |
| | <u>4</u> (services), <u>Item 7</u> (clients), <u>Item 13</u> (account monitoring) and <u>Item 16</u> (discretionary authority). |
| Item 3: What fees will I pay? | For our investment management services advisory clients, we charge an investment advisory fee |
| | which is based on a percentage of the value of the assets in your managed portfolio account. The |
| Conversation Starters. Ask | more assets there are in your account, and the higher the value of those assets, the more you will pay in fees. However, the fee rate clients pay will decrease as their assets invested with us increase. |
| your financial professional | bay in rees. However, the ree rate clients pay will decrease as their assets invested with us increase. |
| "Help me understand how | In addition to our fees, you will be responsible for other fees and expenses associated with the |
| these fees and costs might affect my investments. If I give | investment of your assets. These fees and expenses could potentially include brokerage and other |
| you \$10,000 to invest, how | transaction costs, and fees and taxes, related to the purchase and sale of securities for your |
| much will go to fees and costs, | accounts, and any fees charged by custodians for holding your assets. Certain investments we |
| and how much will be invested | select for clients that are managed or sponsored by third parties, such as mutual funds, exchange |
| for me?" | traded funds and alternative investments, bear fees and expenses for their management and |
| , | operation. For additional information, please refer to <u>Item 5</u> of our Brochure. |
| | 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. |
| What are your legal | When we act as your investment adviser, we have to act in your best interest and not put our |
| obligations to me when | interest ahead of yours. At the same time, the way we make money creates some conflicts with |
| acting as my investment | your interests. You should understand and ask us about these conflicts because they can affect the |
| adviser? How else does your | investment advice we provide you. Here are some examples to help you understand what this |
| firm make money and what | means: |
| | |

| conflicts of interest do you have? <u>Conversation Starters. Ask</u> <u>your financial professional</u> "How might your conflicts of interest affect me, and how will you address them?" | • We sponsor various private investment funds, each of which charges a different fee structure. We typically receive higher fees or have the potential to be compensated more from assets invested in our proprietary investment funds than the fees we would receive if a client's portfolio were allocated to other investments. This differential in fees is a potential conflict of interest and gives us an incentive to recommend that clients invest in our proprietary funds rather than other investments in the same asset class for which they will pay a lower fee. |
|--|--|
| | • We currently receive a technology credit from Pershing, a custodian we recommend, in the amount of \$235,000 per year over a period of three years. Pershing may reduce or modify the amount of the credit if the total assets under management in accounts held by PAS/Pershing (excluding assets of a retirement plan subject to Title I of ERISA) significantly decrease at any time unrelated to market conditions. The credit from Pershing is a conflict of interest and incentivizes TC to recommend that clients custody their assets with Pershing based on the credit TC receives, rather than on clients' interest in receiving best execution. |
| | • Our affiliate Telemus Insurance Services ("TIS") has entered into an agreement under which we can be compensated for insurance referrals. |
| | For additional information, please refer to <u>Item 5</u> , <u>Item 10</u> and <u>Item 12</u> of our Brochure. |
| How do your financial professionals make money? | Our Firm's financial professionals are compensated through salary and bonus or a share of the Firm's profits. A portion of that compensation is correlated to the amount of client assets they service, the revenue our Firm earns from the financial professional's services and/or whether the financial professional has been successful in increasing the amount of client assets under the Firm's management. This presents a conflict and incentive for the financial professional to increase the assets in your account and to maintain your investment account with us. We and our affiliates refer clients to third-party service providers and are eligible to receive additional compensation for those referrals. For additional information, please refer to <u>Item 5</u> of your financial professional's ADV Part 2B Brochure Supplement. Compensation of our Firm's financial professionals is unrelated to the type of product client assets are invested in. |
| Item 4: Do you or your financial professionals have legal or disciplinary history? | No for our firm. Yes, for our financial professionals. You can go to <u>Investor.gov/CRS</u> for free and simple search tool to research our firm and our firm's financial professionals. <u>Conversation Starters. Ask your financial professional</u> <i>"As a financial professional, do you have any disciplinary history? For what type of conduct?"</i> |
| Item 5: Additional Information | For additional information about our investment advisory services, and to request a copy of Form CRS, please contact Eric Oppenheim, our Chief Compliance Officer, at (248) 827-0103, or via email at eoppenheim@telemus.com. <u>Conversation Starters. Ask your financial professional</u> <i>"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?"</i> |

Exhibit

This Form CRS dated April 2021 was amended: 1) to disclose disciplinary history of our firm's financial professionals, 2) explain that we typically receive higher fees or have the potential to be compensated more for assets invested in proprietary funds we sponsor than we would if a client's portfolio were allocated to other investments, and that the differential in fee arrangements provides an incentive for us to recommend that clients invest in our proprietary funds, and 3) note, with regard to our fees, that while the amount of our fees increases as client's assets with us increase, the fee rate that our clients pay will decrease.

This Form CRS dated April 2022 was amended: 1) to delete the Beartown Partners Fund LP revenue sharing disclosure since it no longer applies; 2) to delete the RDG Capital Holdings LP revenue sharing disclosure since it no longer applies; 3) Eliminate the Focus Financial Partners, LLC compensation disclosure since it no longer applies; 4) Revise the description of the Pershing technology credit to reflect the new payment formula; and 5) disclose that Focus Treasury & Credit Solutions, LLC, a Telemus affiliate, earns revenue from third-party service providers for client referrals made by the Firm.