

Aventura Securities, LLC is both a FINRA and SEC registered broker-dealer. Our firm's affiliate, Aventura Capital Management, LLC is a SEC registered Investment Adviser. The fees and services offered by the affiliate Firms differ and it is important for retail investors to understand the differences. There are simple tools to research firms and financial professionals at the Commission's investor education website, [Investor.gov/crs](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?

Our firm and its affiliate offer brokerage and advisory services separately to retail investors. Aventura Securities, LLC principally provides execution and custodial services via its clearing firm to its affiliate Adviser, institutional customers or to retail customers on a self-directed basis. Advisory services are offered for an asset-based fee solely by Aventura Capital Management, LLC. Aventura Capital Management, LLC principally advises retail investors on a discretionary basis via high-touch asset management or specific goal driven investment models.

Aventura Securities, LLC does not provide monitoring for retail investment accounts. Aventura Capital Management, LLC monitors retail accounts daily. Portfolio monitoring for our investment advisory clients is part of our standard services.

Aventura Capital Management, LLC accepts retail investment accounts on a discretionary basis. There are generally no limitations on our firm's trading authority. Retail investors may revoke all or some parts of the authority set forth by ACM's advisory agreement. Aventura Securities, LLC accepts discretionary accounts on a limited basis. Broker Dealer discretionary accounts are provided as a cursory service to affiliate customers that transition from the advisory model. Aventura Securities, LLC does not offer discretionary brokerage services to the general public. For both Firms, if the retail investor opens a non-discretionary account, the investor is responsible for all investment decisions regarding the purchase or sale of investments.

Aventura Capital Management, LLC and Aventura Securities, LLC do not offer proprietary investment products nor is advice limited to specific product offerings.

Aventura Securities, LLC does not require any account minimums or investment amount. Aventura Capital Management, LLC does offer retail investors a tiered asset-based fee schedule based on account investment amount.

Specific information to more detailed information about our services may be found at:

<http://www.aventuracap.com/aventura-capital-management-llc-services>

Key Questions to Ask. *Ask our financial professionals these key questions about our investment services.*

- 1. Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types? Why or why not?**
- 2. How will you choose investments to recommend to me?**
- 3. What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?**
- 4. What are the most common conflicts of interest in your advisory, brokerage and affiliate services?**
- 5. How do you choose investments when making recommendations?**
- 6. How often will you monitor my investment account?**
- 7. Does your firm or its representatives have any disciplinary history? For what type of conduct?**
- 8. Who is the primary contact person for my account? What can you tell me about their legal obligations to me? If I have concerns about how this person is treating me, who can I talk to?**
- 9. Tell me how you and your firm make money in connection with my account?**

What Fees will I pay?

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Aventura Securities, LLC charges traditional transaction-based fees. For self-directed accounts Aventura Securities, LLC will charge a negotiated commission between our firm and the client

Aventura Capital Management, LLC typically charges an advisory fee quarterly based on the aggregate amount of assets our firm manages. The amount charged may vary dependent on the negotiated agreement at the time of account opening.

In addition to the above fees, Aventura Securities, LLC charges a processing fee for the mail and receipt of transaction confirmations, inactivity fees, retirement account services fees, custodial fees and banking fees for the movement of monies and/or securities. 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 investment over time. Please make sure you understand what fees and costs you are paying.

Help me understand how these fees and costs might affect my investments. If I give you \$10,000.00 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 providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

We generally do not provide recommendations as your broker-dealer. When we act as your investment adviser, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money create some conflicts with your interest. You should understand and ask us about these conflicts because they can affect the services and investment advice we provide you. Here are some examples to help you understand what this means.

Third Party Payments. Aventura Securities, LLC and Aventura Capital Management, LLC may receive compensation from third parties for the purchase and sale of certain investments.

Principal Trading. Investments that Aventura Securities, LLC buys from our retail investors, and/or sells to a retail investor may be done from our own account, respectively.

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

Receipt of Sales Related Compensation creates a conflict of interest and gives the supervised person an incentive to recommend investment products based on the sales compensation received, rather than on the client's needs. In general, the Company addresses this conflict of interest through an independent review of such transactions by a person that is not involved in the management of the client's account and does not receive direct Sales Related Compensation from such client's transactions.

When in the best interest of the client, the Company will recommend no-load mutual funds.

Clients are informed when Sales Related Compensation is received by Aventura Securities, LLC through transaction confirms.

Mutual Fund Share Class Selection. Mutual Fund Share Class selection creates a conflict of interest for the Firm in the event the Firm, or the Firm's affiliate, receives compensation for the selection of a higher cost class of share when a lower cost share class may be available. Mutual Fund Share Class Selection includes the selection of money market funds to hold customer account cash balances. In general, the Firm will select the lowest cost share available, generally class "I" shares (or broker-dealer equivalent), for customer investment. I shares are not necessarily available for all investments. It is important for the customer to be aware that if the Firm selects a share Class that charges a Sales Fee, 12b-1 trail or other form of fee associated with the selection of a share class its affiliate will receive compensation from the Fund company. This Fee will have an impact on investment returns, however the share class selection may still be in the customer's best interest.

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Unaffiliated Brokers and Agents. In certain instances, clients may have the option to purchase investment products through other brokers or agents that are not affiliated with the Company.

Not Primary Compensation. Sales Related Compensation does not constitute the primary compensation received in the aggregate from client accounts but may in the future.

No Reduction of Investment Management Fee. In most instances, the Company does not reduce its investment management fee as a result of Sales Related Compensation.

How do your financial professionals make money?

Our financial professionals receive cash compensation for their advisory and brokerage related services. Advisory compensation received is directly related to the fee charged on investment accounts via a stated advisory fee multiplied versus the total assets managed by the adviser. Additionally, our firm and its brokerage representatives may receive compensation from the sale or purchase of securities, trails on investment products and miscellaneous fees from securities lending, account maintenance and account processing. Any compensation received poses a potential conflict of interest. Fees and charges may vary due to the complexity and time required to meet client's needs.

Do you or your financials professionals have legal or disciplinary history? Yes.

You are directed to visit Investor.gov/CRS for a free and simple search tool to research the firm, its affiliate and its financial professionals.

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

You can find additional information about our brokerage and advisory services at www.aventuracap.com. Additionally, you may request a copy of our relationship by sending an e-mail to compliance@aventuracap.com. If you need immediate information or would like to contact us directly for a copy of our firm's relationship summary please call 305-466-0467.

For contacts and complaints:

***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?***