Capital Growth Advisors LLC

Form CRS Relationship Summary

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

We are registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ and you need to understand these differences. *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.*

RELATIONSHIPS AND SERVICES

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE TO ME?

Capital Growth Advisors, LLC ("CGA") acts as a finder of customers for private investment funds to qualified retail and institutional investors (collectively referred to as **"investors"**) on behalf of unaffiliated fund managers on a best-efforts basis. We may also introduce qualified investors to private companies seeking to raise capital. Private funds and companies are not suitable for most investors, as they are often highly speculative in nature and illiquid. Additionally, private funds and companies often require investment minimums only suitable for high net worth investors. We do not provide investment advisory services or make recommendations. We do not trade securities, open or hold investor accounts, securities or funds, nor do we monitor your investments. **We do not offer traditional brokerage services.**

We will introduce you to the private investment funds and companies with whom we have agreements and will assist with your interactions with the fund managers. Your appointed Registered Representative will provide fund materials, answer questions, and facilitate scheduling meetings with the fund managers and private companies.

- We do not make investment decisions for you or manage your, or any accounts on a discretionary basis.
- We do not have customer accounts nor do we hold securities of any type or cash for investors
- We do not monitor your account and/or investments on an ongoing basis.
- We offer a limited selection of investments. Other firms could offer a wider range of choices, some of which might have lower costs.

Offering and subscription documents will only be provided by the fund managers or the administrators of the private funds or by the private companies. The private investment funds and companies' offering documents should be reviewed prior to making any investment decisions. We introduce investors to a limited number of private funds and companies and may provide the documents on their behalf, upon request.

QUESTIONS TO ASK US:

- *Given my financial situation, should I choose a brokerage service? Why or why not?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

WHAT FEES WILL I PAY?

Fees and costs affect the value of your account and/or investments over time. The following summarizes the fees and costs you will pay for our services.

Description of Fees earned by CGA: You will not pay our firm a fee to invest in any fund or company that we introduce to you. Instead, CGA is paid by the fund managers and companies a fee equal to a percentage of the management and performance fees, if applicable, subsequently received by the fund managers or a fee equal to a percentage of capital commitments by investors introduced by us.

CGA and its Registered Representatives have an incentive to encourage investors to invest larger dollar amounts into the private funds and companies, as this will result in larger compensation. Management and performance fees charged by the fund managers may differ as may the percentage of fees earned by CGA. Therefore, CGA and its Registered Representatives may be incentivized to encourage investors to invest in funds and companies with higher management and performance fees or higher rates paid to CGA.

Description of Other Fees and Costs: We recommend that Investors review the investment adviser's Form ADV, if available, and the private fund's private placement memorandum for additional information related to fees and expenses you will pay such as management and incentive fees.

Additional Information: **You will pay management fees and costs whether you make or lose money on your investments**. Fees and costs will reduce any amount of money you earn on your investments over time. Please make sure you understand what fees and costs you are paying.

QUESTIONS TO ASK US:

- 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 PROVIDING RECOMMENDATIONS? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

CGA does not make recommendations. Our services are limited to introducing investors to fund managers and companies. The investor is asked to perform their own due diligence prior to deciding to invest. The way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts. Here are some examples to help you understand what this means:

*We receive compensation from the fund manager of the private funds and companies introduced by CGA generally equal to a percentage of the total capital commitments or a percentage of the management and incentive fees earned by the investment adviser on investors introduced by CGA.

QUESTIONS TO ASK US:

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

FOR ADDITIONAL INFORMATION about our conflicts of interest, please review the private investment funds and companies' offering documents.

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals receive cash and non-cash compensation based on the revenue they generate from the sales of products or services.

Registered Representatives receive compensation based on a fixed percentage of revenues earned by CGA on the investors introduced to the fund managers and companies by the Registered Representative. The percentage may vary across the private funds and companies introduced by CGA. Some Registered Representatives receive fixed fees, which can increase if they generate sufficient revenues. In addition, they can earn other non-cash benefits such as conferences, technology, marketing support, equity participation and other non-cash compensation The Partners also share in the firm's profits, which increase as sales increase. The Registered Representative may be incentivized to encourage investors to purchase funds where CGA earns higher fees.

DISCIPLINARY HISTORY

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE A LEGAL OR DISCIPLINARY HISTORY?

NO. CGA as a firm has no disciplinary history. **YES,** regarding certain of our financial professionals. Please visit Investor.gov/CRS for a free search tool to research us and our financial professionals.

QUESTIONS TO ASK US:

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

ADDITIONAL INFORMATION

HOW DO I GET ADDITIONAL INFORMATION ABOUT YOUR FIRM AND SERVICES?

FOR ADDITIONAL INFORMATION about our services, please email invest@capgrowthadvisors.com or contact us at (917) 710-0938. You may request up-to-date information and a copy of this relationship summary by emailing: invest@capgrowthadvisors.com or contacting us at (917) 710-0938 and asking for the Chief Compliance Officer.

QUESTIONS TO ASK US:

- Who is my primary contact person?
- Is he or she a representative of a broker-dealer or investment adviser?
- Who can I talk to if I have concerns about how this person is treating me?