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CLIENT RELATIONSHIP SUMMARY

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Nixon Capital, LLC ("Nixon Capital") is an investment adviser registered with the Securities and Exchange Commission ("SEC"). Brokerage and investment advisory services and fees differ, and it is important for the retail investor to understand the differences. This Form CRS will help you to understand the way Nixon Capital can work with you and their fee structure. This Form also provides questions or considerations you may want to discuss with the financial professional. Free and simple tools are available to research firms and financial professionals at www.invest.gov/crs, which also provides educational materials about broker-dealers, investment advisors, and investing.

What investment services and advice can you provide me?

Nixon Capital provides discretionary investment management services to separately managed accounts. We manage your accounts in a long-only value strategy that invests in equity securities of public companies. As a manager of separate accounts, we have the ability to accommodate certain client-specific investment guidelines.

The investment advice we offer is limited to the equity of the publicly traded companies we invest in. We do not offer tax planning advice or financial planning services and we do not give advice on any proprietary investment products.

Account Monitoring: We monitor the securities held in your account(s) on a continuous basis and will review your account at least quarterly. You are responsible to inform us of any changes in your investment objectives and/or financial situation.

Investment Authority: We manage investment accounts on a discretionary basis whereby we will decide which investments to buy or sell for your account. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing

Account Minimums and Requirements: We have a minimum initial balance of \$1,000,000 but we may accept accounts of lower value at our discretion.

Conversation Starter:

- *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?*

What fees will I pay?

Nixon Capital charges a management fee calculated as a percentage of assets under management within your account. The fee will be calculated on a quarterly basis (at the beginning of each calendar quarter) and paid on a monthly basis (at the beginning of each month). Each Client's management fee may vary, depending on the relationship, amount of assets under management, among other factors, but will not exceed 1% of total Client assets under management. The more assets there are within your advisory account, the more you will pay in fees. Therefore, we have an incentive to increase the assets in your account.

The costs of operation and administration of your account, including custodian fees, brokerage commissions, transactional fees, and other related costs and expenses are exclusive of and in addition to the above fees paid to Nixon Capital.

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. Your specific fee schedule can be found in your investment management agreement.

Conversation Starter:

- *Help me understand how these fees and costs might affect my investments. If I give you \$1,000,000 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 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 that means: our employees are permitted to buy and sell the same securities recommended to clients as long as personal investing practices are consistent with fiduciary standards and regulatory requirements, and do not conflict with their duty to Nixon Capital and its clients.

Read more about our conflicts of interest and how we manage them in Item 8 of our ADV Part 2A.

Conversation Starter:

- *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 paid a salary and bonus. We do not compensate employees based on the amount of client assets serviced, nor do we accept compensation for the sale of securities or other investment products.

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

No, our firm and our financial professionals do not have any legal or disciplinary history to disclose. For a free and simple search tool to research Nixon Capital and its financial professionals, please visit www.investor.gov/CRS.

Conversation Starter:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*
- *Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

Additional information about our investment advisory services and a printed copy of Form CRS can be obtained by contacting Ryan Nixon at ryan@nixoncapital.com, calling us at 512.354.2491, or visiting us at www.nixoncapital.com.