

CUSTOMER RELATIONSHIP SUMMARY

June 30, 2020

FinTrust Capital Advisors, LLC

Form CRS

FinTrust Capital Advisors, LLC (“FCA”) is registered with the Securities and Exchange Commission (“SEC”) as an Investment Adviser (“RIA”) under the Investment Adviser Act of 1940 (“1940 Act”). Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the 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.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

FCA provides the following investment advisory services to retail investors: investment advice, asset allocation, participation in wrap fee programs, and other third-party platforms. Services are offered through a wrap fee program or a non-wrap fee program. In a wrap fee program, clients are charged an all-inclusive wrap fee that covers advisory and execution services. As part of our standard service we are responsible for performing periodic reviews and consulting with you at least annually.

FCA also offers financial planning for a fee which can provide the client with a written financial plan addressing personal financial goals. Once a financial plan is delivered, we do not commit to provide on-going monitoring of your assets that are not managed by FCA.

In addition, FCA provides financial reporting and consulting services to the named Trustee or Personal Representative of estates as an information service.

FCA provides investment supervisory services on a discretionary and non-discretionary account basis. In a discretionary account, the Adviser will have the authority to determine which securities are bought and sold, or which third-party investment strategist to hire or fire, without prior consultation with the client. Discretion is exercised in a manner consistent with the client’s stated objectives, and any restrictions the client provides in writing. In a non-discretionary account, the client makes the ultimate decision regarding the purchase or sale of investments. Discretionary authority is provided as part of the Investment Advisory Agreement.

FCA allocates the client’s assets to various proprietary and third-party investment strategies and investment vehicles that are available as investment options, including discretionary separate account strategies managed by FCA, third-party discretionary separate account strategies (“Sub-Adviser”), affiliated and unaffiliated open-end investment companies registered under the Investment Company Act, exchange-traded funds (“ETFs”), equities, options, fixed income securities and investment trusts. The minimum account size is \$100,000 but may be negotiated in certain instances.

Additional information about services provided are available in our [ADV Disclosure Brochure](#) (Form ADV Part 2A, Items 4, 7, 13 and 16; or Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure, Items 4 and 9) and on our website at <https://fintrustadvisors.com/>.

When considering our services, ask your investment advisor:

- 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?

FCA charges most retail investors an annualized asset-based fee, billed quarterly in arrears or advance, as stated in the Investment Advisory Agreement. FCA may also charge a flat, fixed fee for its services or in some instance hourly fees for financial planning or estate services. Fees associated with wrap fee programs will include most transaction costs and fees, and therefore are higher than a typical asset based advisory fee program that does not include such costs. The more assets there are in a retail investor’s advisory account, the more a retail investor will pay in fees, and this creates an incentive for us to encourage you to increase the assets in your account.

Aside from the fees we charge you for providing investment advice, you may have to pay other fees related to brokerage or investment advisory services. Fees can be charged directly or indirectly. Direct fees include transaction fees (in a non-wrap fee account) and account maintenance fees (including IRA fees) charged by the custodian that holds your account, fees charged by third-party investment managers, prime broker fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Indirect fees include internal management fees (including 12b-1 fees and annual fund operating expenses) charged by Mutual funds and exchange traded funds, which are disclosed in a fund’s prospectus.

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.

Additional information about fees is available in our [ADV Disclosure Brochure](#) (Form ADV Part 2A, Item 5; or Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure, Item 4).

When considering our services, ask your investment advisor:

- 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 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 this means.

FCA manages the FinTrust Income and Opportunity Fund (the “Fund”) which is a series of 360 Funds (the “Trust”), a Delaware statutory trust registered as an open-end management investment company under the Investment Company Act of 1940. As the adviser to this Fund, FCA could have a conflict of interest due to competing priorities. These conflicts of interest create a financial incentive for FCA and its personnel to invest client assets in this Fund and thereby increase the fees or other compensation payable to FCA and/or its affiliates. In order to mitigate this conflict of interest, FCA will consider whether the Fund is an appropriate investment for the client, and it is FCA’s policy not to charge an investment advisory fee on the Fund’s assets held in the account.

FCA uses FinTrust Brokerage Services, LLC “(FTBS)”, to execute transactions through the clearing firm National Financial Services (“NFS”) for accounts custodied with NFS. Economic benefits are received from FTBS and NFS that might not otherwise be available to FCA, including revenue sharing of credit interest, margin interest and 12b-1 fees (trails) charged by mutual funds. This also is a conflict of interest for the firm. Form CRS for FTBS is available on our website at <https://fintrustadvisors.com/>.

When considering our services, ask our financial professional:

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

Additional information about conflicts of interest are available in our [ADV Disclosure Brochure](#) (Form ADV Part 2A, Item 10; or Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure, Item 9).

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our investment advisors receive a percentage of the fees you pay for our services. As the total assets they manage increases, their percentage of payout increases. Investment advisors may sometimes receive indirect compensation by way of training and sponsorship of events from various third-party vendors. Receipt of compensation creates a conflict of interest for our investment advisors.

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

Yes, visit Investor.gov/CRS for a free and simple search tool to research us and our investment advisors.

When considering our services, ask your investment advisor:

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

Additional information about services provided can be found on the company’s website <https://fintrustadvisors.com/> and on FCA’s [ADV Disclosure Brochure](#) (Form ADV Part 2A Brochure and Wrap Fee Brochure). You can always ask your investment advisor for more information and request a copy of this relationship summary by calling us at (864) 288-2849 or toll-free at (866) 626-5295.

When considering our services, ask your investment advisor:

- 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?