

# CUSTOMER RELATIONSHIP SUMMARY

June 30, 2020

Fintrust Brokerage Services, LLC

Form CRS

FinTrust Brokerage Services, LLC (“FTBS”) is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer and is also a member of FINRA, MSRB and SIPC. 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](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer full-service brokerage to retail investors, providing recommendations in the purchase and sale of a variety of security products. Most frequently, we will recommend transactions in equities, exchange traded funds (“ETFs”), mutual funds, bonds and money market funds. Occasionally, we will recommend transactions in Unit Investment Trusts (“UITs”), new issued preferred stocks, structured notes, private placements, options, or variable annuities. Other products may be recommended, when deemed to be in your best interest.

We offer many different brokerage account types including individual and joint accounts, custodial accounts, estate and trust accounts, partnership accounts, 529 accounts, annuities, individual retirement accounts, and other types of retirement accounts as outlined in our account agreement(s). You should refer to our account agreement(s) for more information concerning available account types or speak with a registered representative.

When we make a brokerage recommendation, you make the ultimate decision regarding the purchase or sale of investments. You may accept or reject any recommendation we make. It is also your responsibility to monitor the investments in your brokerage account, and we encourage you to do so regularly. We do not commit to provide on-going monitoring of your brokerage account. If you prefer on-going monitoring of your account or investments, you should speak with a Registered Representative about whether an advisory services relationship is more appropriate for you.

There is no minimum initial account balance required to open a brokerage account with us. However, if you either fail to fund your account or do not return account opening documents as required, your account will be closed. In addition, an inactivity fee will be charged if you do not have any securities transactions during the year.

**Additional information** about services provided are available in our Regulatory Best Interest Disclosure Brochure and on our website at <https://fintrustadvisors.com/>.

### When considering our services, ask your registered representative:

- Given my financial situation, should I choose a brokerage 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?

You will pay transaction-based fees for trades you decide to enter into, such as buying and selling stocks, bonds, Exchange Traded Products (“ETPs”), mutual funds, annuity contracts, exercising options, and other investment purchases and sale. These transaction-based fees are generally referred to as a “commission,” “mark up,” “mark down,” “sales load,” or a “sales charge.” You will be charged more when there are more trades in your account, and we, therefore, have an incentive to encourage you to trade often.

Aside from the fees we charge you for buying and selling securities, you will have to pay other fees related to brokerage services, which could be charged directly or indirectly. Direct fees include custodial fees and account maintenance fees (including IRA fees) charged by the clearing firm; margin interest fees, markups and markdowns; redemption fees; wire fees; transfer fees; etc. Direct fees will be shown on your trade confirmation and/or brokerage account statement. Indirect fees include internal expenses charged by mutual funds and ETF’s (including 12b-1 fees and annual fund operating expenses).

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 FTBS Regulatory Best Interest Disclosure Brochure and in your Customer Agreement.

### When considering our services, ask your Registered Representative:

- 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 AS MY BROKER DEALER? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

When we provide you with a recommendation, 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 recommendations we provide you. Here are some examples to help you understand what this means:

**Revenue Sharing:** FTBS has a conflict of interest through its revenue sharing arrangements with our Clearing Firm and other product providers, including investment companies. For example, we receive a portion of the margin interest charged on debit balances, interest earned on credit balances, annual account fees, returned/bounced check fees, stop payment fees, returned items on legal transfers, and certificates that are transferred and shipped in physical form. This provides an incentive to recommend these services. When FTBS recommends FinTrust Capital Advisors, LLC (“FCA”) for investment advisory services, your Registered Representative receives a portion of the advisory fees paid to FCA. Therefore, we have an incentive to recommend FCA over other investment advisers. FCA’s Form CRS is available on our website at <https://fintrustadvisors.com/>.

**Principal Trading:** When you buy or sell securities in a brokerage account, we may impose a markup (increase) or markdown (decrease) in the price of transactions we execute on a principal basis. When we buy and sell for our own account, we have the potential to profit on that trade in addition to the markup or commission. The capacity in which we act will be listed on your trade confirmation.

**Proprietary Products:** FinTrust Capital Advisors, LLC (“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. FCA is also under common ownership with FTBS. FTBS has a conflict of interest due to competing priorities. These conflicts of interest create a financial incentive for FTBS and its personnel to invest client assets in this Fund and thereby increase the fees or other compensation payable to FTBS and/or its affiliates. In order to mitigate this conflict of interest, FTBS will consider whether the Fund is an appropriate investment for the client.

**Third-Party Payments:** Periodically, we will recommend alternative investments to Accredited Investors (as defined by SEC Rule 501). If those clients invest in subsequent fund series, we will receive a referral fee.

<b>When considering our services, ask your Registered Representative:</b>
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| <ul style="list-style-type: none"><li>• How might your conflicts of interest affect me, and how will you address them?</li></ul> |
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*Additional information* about conflicts of interest is available in our Regulatory BI Disclosure Brochure.

## HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Registered Representatives earn a portion of the commissions and other transaction fees you pay. As commissions are based on a number of factors, so is the compensation paid to our Registered Representatives. For example, certain products pay higher commission rates than others. Receipt of compensation creates a conflict of interest for our Registered Representatives.

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

Yes, visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our Registered Representative.

<b>When considering our services, ask your Registered Representative:</b>
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| <ul style="list-style-type: none"><li>• As a financial professional, do you have any disciplinary history? For what type of conduct?</li></ul> |
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*Additional Information* about services provided can be found on the company’s website <https://fintrustadvisors.com/> and on FTBS Regulation Bests Interest Disclosure.

You can always ask your Registered Representative 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.

<b>When considering our services, ask your Registered Representative:</b>
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| <ul style="list-style-type: none"><li>• Who is my primary contact person?</li><li>• Is she or he a representative of an investment adviser or a broker dealer?</li><li>• Who can I talk to if I have concerns about how this person is treating me?</li></ul> |
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