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## Introduction

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Gibraltar Capital Management, Inc. is registered with the U.S. Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [investor.gov/CRS](http://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## What investment services and advice can you provide me?

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Our primary business is managing your investment portfolio on a discretionary basis and providing financial advice for a myriad of private client matters. We offer this service through the selection of various publicly traded securities - including mutual funds, exchange traded funds, stocks, and bonds in taxable and tax deferred accounts. We agree upon terms in writing (via an Investment Management Agreement) that specifies the discretionary authority we have to buy and sell investments in your account without asking you in advance. We monitor and review your portfolio on a regular basis. The only limitations on the investment authority are those limitations you impose in writing. For on-going monitoring, we review your current financial situation and prepare recommendations in accordance with your goals and objectives. In making investment decisions, we rely on your input that we get in person and in writing. We tailor our investment portfolios to your individual needs by educating ourselves on your financial circumstances and preferences. Generally, there are no limitations to the types of investments we offer clients. We suggest a minimum total accounts' value of no less than \$500,000 per household. However, we use that as a guideline only – all minimum requirements are subject to negotiation at our sole discretion.

Also note that we serve as an investment adviser to real estate funds (the "Funds") that are exempt from registration under the Securities Act of 1933 as well as the Investment Company Act of 1940. Accordingly, the interests the Funds are available exclusively to investors that meet specific eligibility and suitability requirements required to satisfy those exemptions.

For more detailed information on our relationships and services, please see Item 4 – Advisory Services and Item 7 – Types of Clients of our Form ADV Part 2A.

### Conversation Starters:

- *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?

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We charge a fee every three months (quarterly) in arrears based on a percentage of assets under management.

**Conflicts of Interest:** The more assets in your advisory account, the more you will pay in advisory fees, and we therefore have an incentive to encourage you to increase the assets in your account. **Other Fees and Costs:** We customarily cover any brokerage commissions, transaction fees, and wire transfer fees at our discretion. Mutual funds and exchange traded funds also charge internal management fees, and you are responsible for these fees, in addition to investment-related taxes.

***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.***

For more detailed information on our fees, please see Item 5 – Fees and Compensation of our Form ADV Part 2A.

***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?***

**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:

- We have a financial incentive to recommend that you rollover retirement plan assets into an IRA we manage; however, we seek to educate you on your options and the fees and benefits associated with each choice and then allow you to choose which you feel is in your best interest.
- To the extent our clients invest in our affiliated Funds, we may receive higher fees than we would otherwise receive. Because we stand to earn additional fees associated with these investments, we have an apparent incentive to direct client assets to these vehicles, as opposed to separately managed accounts where we do not earn those additional fees.
- One of our principals serves as trustee for certain trusts that are also clients of the Firm. This creates an apparent conflict where we could favor these clients over others.
- We use Fidelity as the custodian for certain client accounts. Fidelity's services include research, brokerage, custody and access to mutual funds and other investments that are otherwise available only to institutional investors. These other products and services assist us in managing and administering client accounts. We conduct an annual client appreciation event, to which Fidelity contributes to the cost of holding the event.
- An affiliate of the Firm provides tax preparation and bookkeeping services. In addition, another affiliate of the Firm provides business consulting services and executive leadership.

For more detailed information on conflicts of interest, please see Item 10 – Other Financial Industry Activities and Affiliations and Item 12 – Brokerage Practices.

**Conversation Starters:**

- *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?*

**How do your financial professionals make money?**

Our financial professionals are compensated based on salary. They do not receive compensation based on the time and complexity required to meet a client's needs, the amount of client assets they service, the products sold, or product sales commission.

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

No for our Firm. Yes, for a representative who has a prior administrative disciplinary action unrelated to our Firm. You can visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research our financial professionals.

**Additional Information**

You can find additional information about our investment advisory services by visiting [www.sec.gov/check-your-investment-professional](http://www.sec.gov/check-your-investment-professional) or [www.brokercheck.finra.org/](http://www.brokercheck.finra.org/) and searching with our CRD #122328 or by visiting [www.gcmwealth.com](http://www.gcmwealth.com) You can request up to date information and a copy of our client relationship summary by contacting us at [info@gcmwealth.com](mailto:info@gcmwealth.com) or (918) 492-4209.

**Conversation Starters:**

- *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?*

**Form ADV Part 3 / Customer Relationship Summary**  
**Summary of Material Changes**  
**Gibraltar Capital Management, Inc.**  
**Effective Date: March 2026**

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This document has been rewritten in its entirety.