

CFT Capital Management, LLC Form CRS Customer Relationship Summary, April 2022

CFT Capital Management, LLC (“CFTCM”) is registered with the Securities and Exchange Commission (SEC) as an investment advisor. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.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 investment advisory services to retail investors, including family offices. When we provide you portfolio management services for a separately managed account, we generally do so on a non-discretionary basis and invest in private companies at various stages of their life cycle, including venture capital, growth equity, buyouts, and secondaries and recapitalizations. We also may make investments in real estate and private funds.

When we manage your account, we consult with you to establish and implement specific investment objectives and guidelines, which may include investment restrictions and limits. These investment objectives and guidelines will generally be set forth in your investment management agreement. Portfolios are monitored and reviewed by investment personnel on an ongoing basis. Details of the monitoring vary based on the nature of the investment strategy and the investments made. We generally have a minimum portfolio size of \$5 million for each new client relationship. For additional information about our services, please see our Form ADV Part 2A brochure (Items 4 and 7).

Conversation Starters – Ask Us

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?

When we provide you portfolio management services, we generally charge you a flat fee, which is payable quarterly in arrears directly by the client. We generally do not have authority to deduct advisory fees directly from one or more of your accounts. In some situations we are also entitled to performance allocations in the form of carried interest. We may enter into a variety of different fee compensation structures for our non-discretionary services, which would generally vary substantially from our fee structure for providing advisory services where we have full discretion.

Please note that you may incur certain charges and fees imposed by third-parties that are separate from the advisory fee we will charge you. These charges may include brokerage commissions, custodial fees, transaction fees, and third-party investment management fees. Thus, depending upon the investment we recommend, you may be directly and indirectly paying two levels of advisory fees (one layer paid directly to us and one layer paid to a third-party investment manager). You should also note that if we charge you an asset-based fee, the more assets there are in your account, the more you will pay in fees. Therefore, in such cases, we would have an incentive to encourage you to increase the assets in your account.

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 additional information, please see our Form ADV Part 2A brochure (Items 5 and 6).

Conversation Starters – Ask Us

Help me understand how these fees and costs might affect my investments. If I give you \$10,000,000 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 affect the recommendations we provide you. Here are some examples to help you understand what this means.

- Certain of our employees are also employed by a family office client of CFTCM and may therefore spend a significant amount of time and resources on this client that do not benefit our other clients. In addition, this family office client provides certain administrative services to us pursuant to an administrative services agreement. Our employees' affiliation with the family office client and the existence of the administrative services agreement creates a potential conflict of interest as CFTCM and our employees may have an incentive to favor the family office client over our other clients. This conflict is mitigated, however, by certain policies and procedures in place, the fact that the family office client is the principal investor in another client of CFTCM (a private fund), and the fact that any new investment recommendations by CFTCM are generally not allocated to the family office client as our advisory services to this client are generally limited to the monitoring of the client's existing securities holdings.
- We may potentially receive performance-based fees in the form of carried interest from certain clients. A conflict of interest exists when certain clients are charged performance-based compensation while other clients are not as we have an incentive to favor the performance fee clients. Such a conflict may present particular concern when, for example, we allocate securities transactions that we believe could more likely result in favorable performance, or execute potentially conflicting or competing investments. To mitigate this conflict, our policies and procedures seek to provide that investment decisions are made in accordance with the fiduciary duties owed to our clients and investors, without consideration of our other interests.

For more information about our conflicts of interest, please see our Form ADV Part 2A brochure (Items 6 and 10).

Conversation Starters – Ask Us

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

How do your financial professionals make money?

With the exception of Warren Woo, our employees are employed by a family office client of CFTCM and are paid a salary and bonus from that entity. Warren Woo instead receives a significant portion of CFTCM's advisory fees that are charged to the family office client. In addition, all of our principals receive a share of any performance fees (carried interest) earned by CFTCM. Neither CFTCM nor our employees receive any brokerage commissions or sales charges from any transactions effected on behalf of clients.

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

No. Visit [Investor.gov/CRS](https://investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

Conversation Starters – Ask Us

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

Additional information about our firm can be found at <https://adviserinfo.sec.gov/>. You can obtain a copy of this relationship summary, or any other up-to-date information, upon request and free of charge by contacting us at 310-437-7711.

Conversation Starters – Ask Us

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?