

Howard Capital Management Group, LLC (“we,” “our,” or “us”) is registered with the Securities and Exchange Commission as an investment adviser. 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 such as you through the management of your separate account. As part of our standard services, we monitor each account on an ongoing basis, using our current model portfolio as a guide, and we typically furnish clients with portfolio appraisal reports on a quarterly basis. Our authority to manage a retail investor’s account is usually discretionary, which means that you authorize us to select the identity and amount of securities to be bought or sold, subject to your stated investment objectives. For most retail investors, we generally limit purchases to publicly traded equity and debt securities. When determined appropriate by us, we will also purchase exchange traded funds (“ETFs”). For certain retail investors, we generally purchase ETFs exclusively. Our minimum account size is \$1 million.

Additional Information: Please also see Items 4, 7 and 13 of Form ADV, Part 2A.

#### **Conversation Starters - Ask your financial professional:**

- **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?

We charge a fee based on the type of service we provide and total assets in your account. The Equity & Balanced Investment Advisory Services fee, which is payable quarterly in advance, is calculated from sliding fee schedules with an annual rate of 1.25% on the first \$999,999 plus, 1.00% on the next \$1,000,000 to \$2,999,999 plus, 0.90% on the next \$3,000,000 to \$4,999,999 plus, 0.80% on next \$5,000,000 to \$9,999,999 plus, and 0.75% on the next \$10,000,000 and above, in your account. There is an equity and balanced minimum annual fee of \$10,000. The Fixed Income Investment Advisory Services fee, which is payable quarterly in advance, is calculated from sliding fee schedules with an annual rate of 0.60% on the first \$2,499,999 plus, 0.50% on the next \$2,500,000 to \$4,999,999 plus, 0.40% on the next \$5,000,000 to \$9,999,999 plus, 0.35% on the next \$10,000,000 and above, in your account. There is a fixed income minimum annual fee of \$6,000. In certain circumstances fees may be negotiated. Negotiated fees may be higher or lower than our standard fee schedules above.

The more assets there are in your account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account. Our fee does not include (and you will pay separately) brokerage commissions, transaction fees, and charges imposed by custodians, brokers and other third parties such as custodial fees, wire transfer and electronic fund fees, and other fees and taxes on your account and on the securities transactions in your account. Money market funds, mutual funds, and ETFs also charge their own internal management fees.

Additional Information: 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. Please also see Item 5 of Form ADV, Part 2A.

**Conversation Starter - Ask your financial professional:**

- 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 is an example to help you understand what this means. Various unaffiliated custodians provide economic benefits to us in the form of support products and services available to advisers like us whose clients maintain their accounts with the custodians. We have an incentive to recommend that clients maintain their accounts with those custodians in order to continue receiving their products and services.

Additional Information: Please also see Items 10-12, 14 of Form ADV, Part 2A.

**Conversation Starter - Ask your financial professional:**

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

How do your financial professionals make money?

In addition to salary and merit bonuses, certain of our financial professionals are eligible for sales awards and other prizes and bonuses that are based, at least in part, on the number or amount of sales, client referrals, or new accounts. Some of our financial professionals are eligible for additional compensation from our indirect parent company, Focus Financial Partners, LLC (or one of its affiliates), depending on our annual revenues and/or earnings. This potential for increased compensation provides an incentive for these financial professionals to encourage you to maintain and even increase the size of your investment account with us. For more information regarding these activities, please refer to Item 10 of Form ADV, Part 2A and your financial professional's Form ADV, Part 2B Supplement.

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

No, we do not. You may visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Conversation Starter - Ask your financial professional:**

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

Additional Information

**For additional information about us, refer to our website:** [www.howardcapital.com](http://www.howardcapital.com) and/or email us at [info@howardcapital.com](mailto:info@howardcapital.com). **If you would like additional, up-to-date information or a copy of this relationship summary disclosure, please call (310) 473-9100.**

**Conversation Starter - Ask your financial professional:**

- 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?