

Client Relationship Summary

Item 1. Introduction

BluePointe Capital Management, LLC (“We” or “BPCM”) was founded in 2006 and is an investment adviser registered with the United States Securities and Exchange Commission. As an investment adviser, we provide advisory services for fees (rather than for brokerage commissions). We encourage you, as a retail investor, to understand the important differences between services and fees of an investment adviser versus those of a broker-dealer. Free and simple tools to research firms and financial professionals, and educational materials about broker-dealers, investment advisers and investing are available at www.investor.gov/CRS.

Item 2. Relationships and Services

What investment services and advice can you provide me? We provide investment advisory and consulting services to retail investors (Individuals, High Net Worth Individuals) and to Charitable organizations, Trusts and estates, Corporations, or other businesses. After reviewing your financial circumstances and determining the investment goals and objectives, we create and manage a portfolio tailored to those goals. Clients may impose reasonable restrictions on investment in certain securities. We will manage accounts on either a **discretionary** (We have the authority to purchase or sell securities without prior approval from you) or **non-discretionary** basis (We must receive approval from you before conducting any trades) as directed in the investment management agreement that all clients must sign. If appropriate, We may recommend the use of independent investment managers to manage certain types of investments in your portfolio. We regularly monitor your accounts and investments and offer you the opportunity to meet with us at least annually to discuss your portfolio. Based on your needs, your portfolio will include some or all of the following investments: exchange-listed securities, securities traded over the counter (OTC), securities of foreign issuers, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, mutual fund shares, exchange-traded funds (ETF), U.S. government securities, options contracts on securities, interests in real estate or oil and gas partnerships, interests in private equity, venture capital funds and private companies, hedge funds, private funds and cash or cash equivalents.

We also offer non-discretionary investment advisory services to you with respect to your individual employer-sponsored retirement plan. If authorized by you, we will provide you with recommendations on the asset allocation of your account only.

In addition to the investment advisory services described above, BPCM also provides focused consulting services that may include specific consultation and administrative services with legacy holdings, insurance, or any other financial matter. The fees and account minimums for the services described above are included in Item 3 of this disclosure.

BPCM and its affiliate, BluePointe Ventures, LLC is the manager of several private pooled investment funds. **Investment in these private funds requires a certain level of sophistication, and due to qualification limitations, these may not be available to you.** *Clients are advised that a conflict of interest exists if the Adviser recommends its own services.*

Each client is responsible for promptly notifying us if there is a change in their financial situation or investment objectives.

*****For additional information, we recommend reading our ADV Part 2A, Items 4, 5, and 7*****

Conversation Starters - ask your financial 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?*

Item 3. Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

BPCM does not impose an account minimum for starting or maintaining an Investment Management account, however we generally impose a minimum annual fee of \$10,000.00. Annual fees for advisory services are based on a percentage of the value of the assets under our management. The tiered annual fee schedule ranges from 1.5% for accounts valued up to \$1,000,000, to 0.50% for accounts valued at \$75,000,000 to \$99,999,999. The more assets there are in your advisory account, the more you will pay in fees. We may therefore have an incentive to encourage you to increase the assets in your account. You will also pay other third-party fees, such as custodian fees and fees related to mutual funds and variable annuities. Additional details about fees and costs are included in our Form ADV Brochure, which is provided to all clients, and is available on our website, www.bluepointecapital.com.

We may recommend the use of independent investment managers in managing a portion of your assets. These Independent Managers are available to you directly or through a wrap fee program. Wrap fee programs will include most transactions costs and fees to a broker-dealer or bank that has custody of your assets and therefore are higher than a typical asset-based advisory fee.

Consulting fees are negotiated with you and billed at an hourly rate or charged a fixed fee based upon the nature and complexity of the project.

Investors in BluePointe Ventures, LLC (“BPV”) funds will be charged an annual management fee in accordance with the fee schedule set forth in the Confidential Private Offering Memorandum of each of the BPV Funds. BPCM advisory clients who are also investors in BPV funds may be subject to BPCM advisory fees on their BPV Fund investment. The Confidential Private Offering Memorandum of each BPV fund fully discloses whether BPCM charges an advisory fee on that fund.

For more detailed information, we recommend reading our ADV Part 2A, Items 5, 6 and 12.

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 understand what fees and costs you are paying.

What are your legal obligations to me when acting as my investment adviser? As a fiduciary under federal law, we owe to our clients a duty of care and loyalty. This is an important element of the Commission’s investor protection efforts. The Advisers Act establishes a fiduciary duty for investment advisers. Our fiduciary duty is broad and applies to the entire adviser-client relationship.

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 can create conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice or recommendations, we provide you.* Here are some examples to help you understand what this means.

BPCM and BPV are the manager of several pooled vehicles and may receive a management fee and/or carry as outlined in the Confidential Private Offering Memorandum of each fund. You should be aware that the receipt of additional compensation by us may create a conflict of interest that could impair our objectivity when making advisory recommendations. BPCM and/or its principals may be entitled to receive compensation related to profit allocation payable to us by the BPV Funds. This compensation creates an incentive for us to make investments that are more speculative or riskier than would be the case if there were no profit allocation. To mitigate this conflict, we are required to manage our private funds in accordance with the limitations outlined in the Confidential Private Offering Memorandum of each Fund.

How do your financial professionals make money? Our financial professionals are compensated on a portion of the total fees received by us and a base salary. They have an incentive to encourage you to increase your assets in your accounts and to recommend that you purchase investments that result in additional compensation to them.

For more information about our conflicts of interest, we recommend reading our ADV Part 2A, Items 4, 10, 11 and 12.

Conversation Starters - ask your financial 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?*
- *How might your conflicts of interest affect me, and how will you address them?*

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No. A free search tool to research us and our financial professionals is available at www.investor.gov/CRS

Conversation Starters - ask your financial advisor:

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

Item 5. Additional Information

Additional Information about our services is available by visiting www.bluepointecapital.com, and if you would like to request a copy of this summary, you may contact us at laura@bluepointecapital.com or **(650) 293-4545**.

Conversation Starters - ask your financial 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?*