



Form CRS Client Relationship Summary

Palladium Capital Group, LLC (“Palladium”) is a broker-dealer registered with the Securities and Exchange Commission (SEC). Palladium is also a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ, and it is vital for you to understand these differences. Palladium provides brokerage services. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Palladium has limited brokerage services. We offer you investments in a variety of investment funds, and private and public companies. Palladium does not open or otherwise maintain customer accounts, nor do we hold or accept customer funds or securities.

Account Monitoring / Investment Authority:

We do not monitor your investments on an ongoing basis other than for regulatory purposes. We do not have or offer investment authority over your investments.

Limited Investment Offering / Account Minimums:

Palladium offers limited types of investments. We offer public and private securities which typically have large minimum investment amounts and restrictions on liquidity. Our security offerings are suitable only for investors who meet certain net worth, experience, and accreditation standards—and are limited to investors who at least meet the definition of an [accredited investor](#) and sometimes only for those who meet the definition of a [qualified purchaser](#). We do offer proprietary products.

You may find further information at www.palladiumcapital.com

What fees will I pay?

Please note, 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 investment over time. Please make sure you understand what fees and costs you are paying.

For private placements, the commissions and other fees are described in detail in the offering documents, including how the commission and other fees impact the value of your initial investment. The private placement issuer pays the commissions. You will pay a transaction-based fee, which is a percentage of the amount you invest. You will not pay any account related service fees, as you do not have an account with Palladium. The fees and charges may differ for each investment.

Questions to Ask

- *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?*

Questions to Ask

- *Help me understand how these fees and cost 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?
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 your interests. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations we provide to you. Here are some examples to help you understand what this means.

Questions to Ask

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

Examples of ways we make money and conflicts of interest. We are paid a transaction-based fee for each investment. This transaction-based fee is a percentage of the amount you invest and is paid in cash compensation and/or securities. We are paid financial advisory fees, are an equity holder, board member, and debt holder with certain issuers and proprietary products. Therefore, we have an incentive for you to invest more. Palladium does not recommend products or services based on compensation/incentives from 3rd parties, or engage in incentive programs such as sales contests, sales quotas, bonuses, or non-cash compensation based on specific products or types of securities.

Care. Your registered representative must exercise reasonable diligence, care, and skill to understand the risks, rewards, and costs associated with the recommendation and have a reasonable basis to believe that a recommended transaction is in your best interest based on your investment profile and doesn't place his interests or those of the firm ahead of yours. This includes avoiding transactions that are excessive.

You should understand and ask us about these conflicts. You may find further information at:
<https://www.sec.gov/tm/faq-regulation-best-interest>

How do your financial professionals make money?

Palladium's financial professionals serving retail accounts are paid a portion of the firm's transaction-based fee revenue that is generated by the transactions we facilitate. This transaction-based fee is a percentage of the amount you invest. Palladium's financial professionals are also paid a portion of the firm's financial advisory fees, are an equity holder, board member, and debt holder of certain issuers and proprietary products. Therefore, our financial professionals have an incentive for you to invest more.

Do your financial professionals have legal or disciplinary history?

Yes. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Questions to Ask

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

Additional Information

You may find additional information about our services at palladiumcapital.com.

You may request a copy of the Form CRS Relationship summary by contacting your registered representative. You may also call (617) 271-6736 for a copy or to request up-to-date information.

Questions to Ask

- *Who is my primary contact person? Is he/she a representative of an investment adviser or broker dealer? Who can I talk to if I have concerns about how this person is treating me?*