

Form ADV Part 3: Relationship Summary Washburn Capital Management Inc.

Introduction

Washburn Capital Management Inc. (“Washburn Capital Management” or “we”) is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

What Investment Services and Advice Can You Provide Me?

Description of Services: Washburn Capital Management offers investment advisory services to retail investors.

We provide advisory services which involves us managing and making trades in your designated account(s). We work with you to create an investment objective and an agreed upon comprehensive financial strategy to meet your objectives within risk parameters acceptable to you. We will continuously monitor your account(s) and contact you at least annually to discuss your portfolio. We also send a letter quarterly and update you on your year-to-date investment results. For more information, please see **Item 4** of our **Form ADV Part 2A** *. Our advisory services are provided on a **discretionary** basis, meaning we will have the authority to determine the type and amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. For more information about investment authority, please see **Item 16** of our **Form ADV Part 2A** *.

Limited Investment Offerings: We primarily recommend equities, fixed income, exchange traded funds and cash and cash equivalents. Some of the risks involved with only recommending these types of securities include market fluctuations, company or industry-specific risk, issuer default and inflation risk. When providing you services, we do not recommend or offer advice on any proprietary products.

Account & Fee Minimums: There are no minimum investment amounts or conditions required for establishing an account managed by us.

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?

Description of Principal Fees & Costs: Fees charged for our advisory services are charged based on a percentage of assets under management, billed in advance on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the previous billing period. The annual fee for our advisory services will vary up to 1.5% depending on the size and complexity of the client’s portfolio and relationship. Because our fee is based upon the value of your account, we have an incentive to recommend that you increase the level of assets in your account. When engaging us for advisory services, you will also incur other fees and expenses. The broker-dealer/custodian on your account will charge you transaction fees for executing certain trades in your account. You will also be charged internal fees and expenses by the funds we invest in within your account.

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. For more information about the fees we charge and the other fees and expenses you will incur, please see **Item 5** of **Form ADV Part 2A** *.

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?*

***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?***

Standard of Conduct: When we act as your investment adviser, we must 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.

To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account (“IRA”) managed by us and subject to our advisory fees, this is a conflict of interest because we have a financial incentive to recommend that you move your IRA to us even if it is not in your best interest. For more information about this conflict and our procedures to mitigate the conflict, see **Item 5** of our **Form ADV Part 2A** *.

When we provide advisory services, we will ask that you establish an account with Charles Schwab & Co., Inc. to maintain custody of your assets and to effect trades for your account. Our recommendation to use Charles Schwab & Co., Inc. is not based solely on your interest of receiving the best execution possible. We also recommend Charles Schwab & Co., Inc. because they provide us with research, client reporting, assist with back-office functions, access to products and tools that help us manage your account and help us further develop our business operations. As a result, we do not have to pay for such benefits, which save us money; however, these arrangements create a conflict of interest. See **Item 12** of our **Form ADV Part 2A** * for more information about our arrangements with Charles Schwab & Co., Inc. We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts. For more information see **Item 11** of **Form ADV Part 2A** *.

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

Additional Information: For more information about our conflicts of interests and the ways we are compensated, please see **Item 5** and **Item 10** of our **Form ADV Part 2A** *.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

Neither us, nor our investment adviser representatives have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

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

How Do Your Financial Professionals Make Money?

Description of Salary/Payment of IARs: We are compensated through a salary and a portion of the profits based on net income generated throughout the year.

Additional Information About Washburn Capital Management

*You can find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/125708>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at 772-564-7291.

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?*