

RE: Customer Relationship Summary (Form CRS) (Effective October 1, 2023)

Item 1- Introduction

Coughlin and Company Inc. (“Coughlin” or the “Firm”) is a broker-dealer, registered with the Securities & Exchange Commission (“SEC”) and the Financial Industry Regulatory Authority (“FINRA”) as well as a member of the Securities Investor Protection Corporation (“SIPC”). We offer broker-dealer services, and not investment advisory services. It is important to understand that brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. There are free and simple tools to research firms and financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2- Relationships and Services

What investment services and advice can you provide me? Coughlin registered representatives assist retail clients by making recommendations for you to buy, sell or hold securities and we can also assist you with various financial services including securities brokerage services, capital markets, and alternative investments. While not all services or products are available to all retail clients because certain investments have investment suitability restrictions and require investors to meet specific accreditations, the Firm does not impose account requirements, such as minimum account size or investment amount, upon individuals hoping to establish a broker-dealer relationship with the Firm. We do not provide ongoing account monitoring in your brokerage account. We do not have discretionary investment authority on any retail brokerage account; however, we may voluntarily review your account holdings for the purpose of making a buy, sell, or hold recommendation.

Conversation Starter-

Ask your financial professional

- “Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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 Standards of Conduct

What fees will I pay? A summary of the fees we charge are listed below. The fees we charge you will depend on the services and products that are offered to you. In brokerage accounts, you will pay the Firm a “Commission” or other “transaction based” fee for each transaction that is executed. Some investments, such as mutual funds, may include compensation to us in the form of an upfront fee (commonly called a “load”) and/or a continuing fee that is charged as long as you hold the investment (commonly called a “trail”). When we purchase a security or sell a security to you from our inventory we are acting as a “principal” and mark up or mark down the price you receive, which benefits us. We are compensated for each investment transaction in a brokerage account. This arrangement provides an incentive for us to make more recommendations for you to trade more frequently. As an investor, there are fees and costs that you will pay whether you make or lose money on your investments. These 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 before making your investment decisions.

Brokerage Transactions For brokerage accounts, the firm offers non-discretionary accounts where the retail investor makes the ultimate decision regarding the purchase and sale of investments. With each account, there is a ticket charge that is passed on to you from our clearing firm and for brokerage accounts there is a commission charge that is agreed upon by you and your registered representative. You may also be charged non-commission costs and fees. For example, our clearing firm currently charges \$20 for wire transfer payments you request. The Firm is not required to monitor your investments on an ongoing basis.

Capital Markets The Firm will earn a commission based on the amount of capital raised which is paid by the issuing entity. The Firm and the registered representative might also be compensated in the form of equity ownership of the issuing entity.

Alternative Investments – The Firm offers various alternative investment products that are generally only available to accredited investors as the nature of these investments have higher risks, longer investment horizons, and generally have little or limited liquidity. The Firm and the registered representative(s) will earn a commission that is paid at the closing of the investment transaction. The Firm and/or its affiliates may also earn other ongoing revenues from providing services (such as property management fees) to entities financed in whole or in part by clients of the Firm.

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?*
- *How do you determine the fees you will charge 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 as your broker-dealer, 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 recommendations we provide you. Here are some examples to help you understand what this means:

- **Proprietary Products:** Our Firm earns more compensation and other benefits when you invest in products that our Firm issues, sponsors, or manages than when you invest in unaffiliated products giving us an incentive to recommend you invest your assets in those products.
- **Principal Trading:** Our Firm may buy securities from you or sell securities to you from its own accounts (“principal trade”) or act as an intermediary between you and the purchaser or seller of securities (“agency trade”) where permitted by applicable law and our policies. Our Firm is incentivized to perform principal trades because it will typically earn more compensation. Our Firm will potentially have a conflicting division of loyalties and responsibilities, including whether to enter into the transaction or not.
- Because we earn a commission on each transaction we may have an incentive to encourage you to trade more often. You should understand and ask the Firm or your registered representatives about these conflicts because they can affect the investment advice we provide you.

How do your financial professionals make money? Our financial professionals may receive a percentage of commissions generated by the products they sell. Some products may pay a commission higher than others. As such, financial professionals have an incentive to sell higher commission products. In addition, certain products, such as mutual funds and variable annuities, pay additional compensation on a periodic basis.

Item 4- Do you or 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.

Conversation Starter-
Ask your financial
professional

- *“As a financial professional, do you have any disciplinary history?”*

Item 5- Contact Information

Who is my primary contact person? Where can I get more information about your firm? As a client or investor, you can contact your registered representative directly or contact *Coughlin and Company, Inc.* at the address and phone number below and you can also request a copy of our updated Customer Relationship Summary (if one exists).

Conversation Starter-
Ask your financial professional

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

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You are under no obligation to invest in any offering and this Customer Relationship Summary does not constitute an offer to buy or sell any security. Offers to purchase or sell private securities may only be made by prospectus or offering memorandum and only in jurisdictions where such offerings are allowed.

Sincerely,

[Coughlin and Company, Inc.](http://www.coughlinandcompany.com)