

FORM CRS (Customer Relationship Summary)

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Introduction

Zephyr Investment Management (“Zephyr”) is registered with the Securities and Exchange Commission (“SEC”) 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://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What Investment Services and Advice Can you Provide Me?

Zephyr offers investment advisory services to retail investors. Our advisory services include, but are not limited to, discretionary and non-discretionary investment advisory services (including investment portfolio monitoring, financial counseling, review of accounts, and securities research), retirement plan consulting services and products, consulting services, and financial planning. There are different types of advisory accounts you can choose. You can select an advisory account that allows us to buy and sell investments in your account without asking you in advance (a “discretionary account”), or we may give you advice and you decide what investments to buy and sell (a “non-discretionary account”).

Additionally, some of our advisory services are sponsored by VISION2020 Wealth Management Corp. (“VISION2020”), our registered investment adviser affiliate. VISION2020 sponsors accounts on the Wealth Management Platform (“WMP”), an investment management program that provides you with access to multiple investment managers who provide investment advice to your portfolio consisting of individual stocks, bonds, exchange traded and mutual funds. To join WMP, you will enter into an investment advisory client agreement with VISION2020, FSC and Zephyr Investment Management.

More detailed information about the services we offer can be found in our Form ADV Part 2A brochure, which can be accessed online at <https://adviserinfo.sec.gov/firm/summary/166303>.

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?

For our advisory services, you will pay an ongoing asset-based fee for our services. Our fee is calculated based upon the market value of the assets in your account on the last day of the previous quarter. We do not receive any other fees for our advisory accounts. One-fourth of our annual fee is charged each calendar quarter in advance. The advisory services may also have account/investment minimums, which are further detailed in the applicable Disclosure Brochure. Financial Planning and Consulting Services fees, when they do not include ongoing investment management services, are based on a flat or hourly rate. These fees are billed monthly, based on actual time spent consulting.

The more assets there are in your advisory account, the more you will pay in fees. Therefore, we may have an incentive to encourage you to increase the assets in the account(s) we manage for you, including recommending rolling assets into an account on which we charge a higher fee (such as a rollover to an IRA from a 401(k)).

In addition to our advisory fees, you may be required to pay other charges, such as custodial fees; brokerage commissions; transaction fees; maintenance and termination fees for IRAs and certain retirement and qualified accounts; internal fees and expenses charged by mutual funds or ETFs; and other fees and taxes on brokerage accounts and securities transactions. Mutual fund companies and ETFs charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Complete details of these internal fees and expenses are explained in the prospectuses for each investment.

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.

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?

When we act as your investment adviser, we have to act in your best interest and not put our interests 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 and investment advice we provide you.

Zephyr may recommend various asset management firms through their affiliation with FSC. If you establish an investment advisory relationship with one of those firms, we and your financial adviser will share in the advisory fees you pay. The above arrangements present a conflict of interest because they create an incentive for us to make recommendations based upon the amount of compensation we receive, rather than based upon your needs. To address these conflicts of interest, we will explain the specific costs associated with any recommended investments with you upon request. Additionally, we may recommend that you purchase certain no-load and load-waived mutual funds to further address these conflicts of interest. You always have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Conversation Starters

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

How do your financial professionals make money?

Our fee-based financial professionals charge an asset-based or flat fee directly to their clients for their services. This fee can be structured in multiple ways, such as an hourly rate, a monthly retainer, a flat annual fee, or a percentage of assets under management.

If you choose to implement your financial plan through our broker / dealer, FSC Securities Corporation, commissions may be earned by your advisory representative for the securities purchased in your brokerage account. They may also receive compensation from the sale of mutual fund products sold to you (such as so-called "12b 1 fees", which are fees paid to cover promotion, distributions, marketing expenses). Mutual funds include these fees in the calculation of their operating expenses. Please know that client accounts can be held on either the advisory side or on the brokerage side or a combination of both. Your advisory representative will not receive commissions on your accounts held on the advisory side with Zephyr.

Advisory representatives may be licensed with various insurance companies to sell insurance products. Commissions may be earned if you purchase insurance products through our advisory representatives in that capacity. Additionally, we may refer you to unaffiliated insurance professionals for certain insurance products. If you purchase insurance products as a result of our referral, our advisory representatives may share in the commissions.

Our advisory representatives may also recommend various asset management firms through their affiliation with FSC. If you establish an investment advisory relationship with one of those firms, we and your financial adviser will share in the advisory fees you pay. The above arrangements present a conflict of interest because they create an incentive for us to make recommendations based upon the amount of compensation we receive, rather than based upon your needs. You always have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Do your financial professionals have legal or disciplinary history?

Neither Zephyr nor its financial professionals have any disciplinary events to disclose. Visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

Conversation Starters

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

Additional Information

For additional information about our services, see our Form ADV brochure on IAPD, on [Investor.gov](https://www.investor.gov), or on our website www.zephyrim.com, and any brochure supplement your financial professional provides. Additionally, you can request up-to-date information and/or a written copy of Form CRS by calling Zephyr at (805) 496-6810.

More detailed information about the services we offer can be found in our Form ADV Part 2A brochure, which can be accessed online at <https://adviserinfo.sec.gov/firm/summary/166303>.