

Relationship Summary

We are Orchard Capital Management, LLC (“Orchard”), an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals’ registration information are also publicly available on the [Investor.gov](https://www.investor.gov) website.

What investment services and advice can you provide me?

We offer customized investment management, integrated planning and personal advisory services, and family office and specialized services to retail investors. We offer advice on a full suite of securities, including equities, fixed income, mutual funds, ETFs, options, and similar investments. Our services are generally provided on a discretionary basis, which means that we have the power to buy and sell securities for your account without your prior consent. This authority is usually unlimited and remains in effect until you revoke it. We may provide non-discretionary investment advice, where we make investment recommendations to you and you decide whether to implement the recommendation. We do not give advice on any proprietary investment products.

We provide continuous and regular supervision of advisory client assets as part of our standard service to you. In addition, we will conduct ad hoc reviews if you change your objectives or risk tolerance, upon significant market and economic events, or if we change our investment strategy.

We require a minimum account size of \$1,000,000.00, which can be waived in unique or special circumstances.

Please see Items 4, 7, and 8 of our [Part 2A Brochure](#) for additional information on our services, investment advice, and account requirements.

Other Questions You May Have

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?

Our quarterly fees are calculated as a percentage of the assets under our management, so our fees will rise and fall with the value of the assets we manage for you. While our fees may reduce the amount of your assets available for investment, we believe they are justified by our services and attention to your needs. Moreover, we believe our interests are aligned with yours in this type of fee structure. Nonetheless, a conflict of interest may appear in that we are economically incented to recommend that you place more assets in your account in order to increase the value of your portfolio, because as the value increases, so do our fees.

In addition to our fees, you will be charged transaction or asset-based fees by your custodian for its services. These fees vary depending on the custodian. Under a transaction fee arrangement, the more transactions effected in your account, the more fees you will pay, and high activity in your account does not assure positive portfolio performance. For custodians that charge their fees based upon a percentage of your assets, such fees may be more than would be the case if you are charged a transaction-based fee. Please be mindful of the effect of your portfolio size, the level of activity, and the rate of custodian asset-based pricing. Generally, large portfolios would be disadvantaged by paying an asset-based custodian fee versus a transaction-based fee. Fees for our family office services will be based on time and type of service being requested. Such engagement will be negotiated on a case-by-case basis. We may also charge performance-based fees to qualified clients. Because performance-based fees involve a sharing of any portfolio gains between the client and the investment manager, they create an economic incentive for us to take additional risks in the management of a client portfolio.

Some securities carry additional costs, such as mutual funds and ETFs. There are additional fees such as internal fees and expenses charged by mutual funds (i.e., 12b-1 distribution fees and management fees that are assessed within the mutual fund) and exchange-traded funds, third-party separate account manager fees, fees imposed by private placements and pooled investment vehicles, postage and handling, transfer taxes, SEC fees for sales of securities.

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. **You can find more information about our fees and costs under Item 5 and 6 of our [Part 2A Brochure](#).**

Other Questions You May Have

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 investment advice we provide you. Here are some example to help you understand what this means:

- We provide oversight and investment management services through a third-party investment platform. Such participation involves multiple layers of compensation through ownership and investment services fees, which in the aggregate create conflicts of interest. Such conflicts include the selection of investment solutions and the management of proprietary private funds in which the firm and its principals yield a higher economic benefit versus other products offered by Orchard.
- We receive research and services provided by broker-dealers from third-party vendors or by requesting that a broker-dealer step-out client trades or pay research credits to broker-dealers or vendors who produce research products or services. We may also trade directly with a broker-dealer who produces research or brokerage services. We utilize an internal allocation procedure to identify those brokers or dealers who produce research or services that are provided to us and endeavor to direct sufficient research credits generated by our clients' accounts to such brokers or dealers to ensure the continued receipt of the research and services that we believe are valuable. To the extent we utilize client transactions to obtain information we might otherwise acquire at our own expense, we may have an incentive to place a greater volume of transactions or pay higher commissions.
- We may utilize solicitors to solicit business on our behalf. We pay the solicitor a percentage of our fee, and although this does not represent an increase in your fees, it does present a conflict of interest in that the solicitor may be recommending you establish an advisory relationship with us because of the payment we make to the solicitor and not because the solicitor feels that we're the best firm for your needs.

Additional information regarding conflicts of interest can be found in Items 5, 6, 10, 11, 12, and 14 of our [Part 2A Brochure](#).

Other Questions You May Have

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

How do your financial professionals make money?

Our financial advisers are compensated solely through a salary and bonus structure. The funds used to compensate the financial advisers are derived from the fees we collect from you. As such, we are incentivized to recommend that you add additional assets to your account. We do not receive non-cash compensation.

Do you or your financial professionals have legal or disciplinary history?

Yes, certain Orchard professionals have disciplinary records, which can be found by accessing Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Other Questions You May Have

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

You can find additional information about our investment advisory services on our [Part 2A Brochure](#). You may contact us at 312-628-6700 or via email to bh@orchardinvetments.com if you have questions or to request a current copy of this Relationship Summary.

Other Questions You May Have

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?