

PART 3 OF FORM ADV: CLIENT RELATIONSHIP SUMMARY (CRS)

FORM CRS (CLIENT RELATIONSHIP SUMMARY) AS OF JULY 8, 2024 SPC FINANCIAL, INC.

SPC Financial, Inc. (“SPC” or “We”) is registered with the Securities and Exchange Commission (“SEC”) as an investment advisory firm. SPC operates a Branch Office of Raymond James Financial Services, Inc. (“RJFS”). RJFS is a broker-dealer registered with the SEC. Investment advisory services and fees are different from broker-dealer services and fees. It is important for you, the retail investor, 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), also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services consisting of financial planning, investment advice and management.

The investment advisor services we offer include:

Financial Planning – We analyze your current financial situation and financial goals. We help you develop a strategy or financial plan intended to achieve your financial objectives. We offer annual, quarterly and periodic investment reviews to align with your financial objectives.

Investment Advice and Management – We offer portfolio management services on a discretionary and nondiscretionary basis. When we manage your portfolio on a discretionary basis, your client agreement with us authorizes us to trade the securities in your account without seeking your consent. When we manage your portfolio on a nondiscretionary basis, your client agreement with us requires us to obtain your consent before trading the securities in your account, and authorizes us to communicate your trading instructions to the broker-dealer and custodian of the accounts we manage on your behalf.

Third-Party Managed – Some investments may be managed on a discretionary basis by a third-party sponsor in a separate account.

Monitoring – We monitor your advisory accounts, assess your portfolio, and make investment decisions as may be warranted by trends in the financial markets, changes in the economy, changes in tax laws, and changes in your personal financial situation.

Wrap Fee Program – We hold the assets of some current clients in a wrap arrangement but we no longer offer a wrap program to new clients.

Limited Investment Offerings – We offer advice on investments that are proprietary as well as non-proprietary products. While we offer advice and investment options on a broad range of investments, some mutual funds, mutual fund share classes, and exchange traded funds may be restricted from being held because they are not in your best interest (e.g., share classes), they are deemed to be too risky, or they are proprietary products of broker-dealer firms.

Account Minimums – We do not have a formal minimum for our investment advisory services, but reserve the right to decline to accept any client we believe is not a good fit for our services.

The broker-dealer services we offer include:

Brokerage Accounts – Our investment professionals provide broker-dealer services to existing clients who hold accounts at Raymond James but are not offering broker-dealer services to new clients.

For additional information, please refer to our ADV Part 2A brochure (“Brochure”), especially Item 4 (services), Item 7 (types of clients), Item 13 (review of accounts) and Item 16 (investment discretion).

CONVERSATION STARTER

Given my financial situation, should I choose an investment advisory service, a brokerage service, or both? 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?

Basic financial planning services are offered with our investment management services for no additional fee. For financial planning services that are more involved and complex, or are provided on a standalone basis, we charge a flat fee that is determined and agreed to on an individualized basis.

For investment advice and portfolio management, we charge an asset-based fee that is calculated as a percentage of the assets under our management in your account(s) as specified in an Investment Management Agreement. Our fee is paid quarterly in advance based on the value of an account at the end of the previous quarter.

Our fees are listed in our client agreements and described in greater detail under Item 5 of our Brochure.



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Finance on a Human Level[®]

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– Securities offered through –
Raymond James Financial Services, Inc.
MEMBER FINRA/SIPC

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In addition to our fees, you will be responsible for the other fees and expenses associated with the investment of your assets. Such other fees and expenses could potentially include brokerage commissions, transaction costs, fees charged by your custodian, exchanges, and taxes. You also will pay fees and expenses associated with investment advice provided by third parties, if any, including management and performance fees and expenses charged by private investment funds, advisory fees charged by third-party managers, and fees and expenses of mutual funds and exchange-traded funds in which you invest.

For additional information, see Item 5 of our Brochure.

CONVERSATION STARTER

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?

To determine whether an investment advisory account is appropriate for you, you should carefully analyze the advisory services provided, whether your investments need to be monitored, and the projected costs of an investment advisory account versus a brokerage account based on factors such as expected size, volume, frequency of transactions and holding period of investments. **You will pay fees and costs in both an investment advisory account and brokerage account 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 that you understand what fees and costs you are paying.**

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?

Whether we act as your investment adviser or as your broker, 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. Here are some examples to help you understand what this means: As an investment adviser, we make money when we offer financial planning services and when your investments are in an asset-based fee account. As a broker, we make money when we buy or sell securities in your account. If we recommend the purchase, sale or continued holding of a mutual fund in an account where we are acting as a broker and are receiving brokerage commissions, we have a conflict of interest. Some mutual funds held in a brokerage account at Raymond James pay 12b-1 fees, which are trailing commissions. If the mutual fund is in an asset-based fee account, in some instances the 12b-1 fees may be credited back to you or our asset-based fee may be reduced by the amount of the fees paid. We receive expense reimbursements from a custodian we recommend to most of our clients and that gives us an incentive to recommend the custodian. This creates an incentive for us to recommend brokerage products to you for the purpose of generating commissions rather than solely based on your needs. Clients who wish to engage us to provide investment advisory services may custody their

accounts where we are not associated with a broker-dealer. You should ask about these and other conflicts because they can affect the investment advice or the recommendations that we provide you. For additional information, please refer to Item 12 of our Form ADV Part 2A brochure.

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

How do your financial professionals make money?

SPC's investment adviser financial professionals are employees of SPC who are paid a base salary and (a) a percentage of the profits of the Firm, or (b) a percentage of the revenues they are responsible for generating from financial planning fees, advisory fees on assets under management, and other products and services such as insurance commissions. Financial professionals have an incentive to increase the assets in your account because their advisory fees also will increase. Financial professionals who are insurance licensed have an incentive to recommend that you purchase insurance products because they will be compensated if you purchase the insurance products.

When serving as a broker to clients with accounts at RJFS, some of SPC's financial professionals receive their base salary and (a) percentage of the profits of the Firm, or (b) a percentage of (commissions, fees from mutual funds, or commissions on other products and services such as insurance. Financial professionals have an incentive to increase the assets in your account and the number of securities transactions because their compensation also will increase.

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

No. Please visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTER

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

Additional Information:

For additional information, about us, please visit our website [spcfinancial.com](https://www.spcfinancial.com). Our Firm Brochure and this Form CRS are available at [spcfinancial.com/clients/forms](https://www.spcfinancial.com/clients/forms). If you would like up-to-date information or a copy of this Form CRS, please call SPC at (301) 770-6800.

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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?

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EXHIBIT

We have revised this Form CRS dated July 8, 2024, to take into account that we no longer offer a wrap fee program or brokerage services to new clients and receive expense reimbursements from a custodian we recommend to most of our clients to hold their account assets.