Arlington Capital Management Customer Relationship Summary – Form ADV Part 3
November 6, 2025

Introduction

Our firm, Arlington Capital Management, Inc., is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for investors to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Our Form ADV Part 2A Firm Brochure is available at https://adviserinfo.sec.gov/firm/summary/114801.

What investment services and advice can you provide me?

We offer Wealth Management Services and ongoing Investment Management Services to retail investors. These are both standard offerings, although they each have a different fee structure.

Wealth Management Services**:** We provide a suite of services that address Investment Management (as described below), Wealth Enhancement, Wealth Transfer, Wealth Protection, and Charitable Giving.

Investment Management Services: We will create and manage your assets in a portfolio model that we believe is most appropriate for your situation. The portfolio model will include at least one of our growth or income strategies. We manage accounts on a discretionary basis, meaning that we will place trades in your account without asking permission beforehand. We also offer non-discretionary services for certain types of accounts, for example, 401(k)'s. In these situations, we will make recommendations to you, but you will ultimately be responsible for effecting the purchase or sale of investments.

Consulting Services: We offer Consulting Services related to financial, investment planning and private placements. The scope of each consulting engagement is described in an advisory agreement specific to the engagement.

We have no specific minimum relationship size for our Wealth Management Services. For our Investment Management Services, we recommend a minimum relationship size of $500,000. You can find additional information about our advisory services in Item 4 of our Firm Brochure.

Conversation Starter - Ask your financial professional:

- *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 fees will I pay?

You will pay an ongoing quarterly fee based on the value of the investments in your accounts. Fees are billed in advance. You will also pay separate custodial and transaction fees. Some investments, such as ETFs, mutual funds, and private placements, incur indirect fees that will reduce the value of your investments over time.

The fees associated with consulting services is determined based on the scope of the work involved and is a fixed price, which is disclosed to clients in their consulting agreement.

The more assets you have in your advisory account, the more you will pay us. We, therefore, have an incentive to increase the value in your advisory account to increase our fees. Arlington, with the client's approval, may engage Sub-Advisors to manage our client's accounts. These Sub-Advisors are unaffiliated, third-party investment advisory firms that receive a portion of the investment management fee that the client pays to Arlington or their fees may be deducted separately from the client account. You will pay fees and costs whether you make or lose money on your investments. Fees and expenses 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 additional information about our fees in Item 5 of our Firm Brochure.

Conversation Starter - Ask your financial professional:

- *Help me understand how these fees and costs might affect my investments. If I give you $1,000,000 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 a responsibility 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 investment advice we provide you. Here are some examples to help you understand what this means.

- The owners of Arlington Capital Management, Inc. also own Advanced Tax Reduction Group LLC, which does business as ClearPoint Family Office ("ClearPoint"). ClearPoint offers tax planning, consulting and preparation services, and estate planning consulting services. Arlington may recommend ClearPoint's services to clients. This creates a conflict of interest because we may have a financial incentive to refer clients to ClearPoint rather than to unaffiliated service providers.
- An owner of Arlington Capital Management, Inc. is also the owner of Arlington Business Advisors ("ABA"). ABA provides business brokerage services to assist business owners with the sale of their businesses. Arlington may recommend ABA's services to clients. This creates a conflict of interest because we may have a financial incentive to refer clients to ABA rather than to unaffiliated service providers.
- An adviser providing investment advice on behalf of our firm is also licensed as an independent insurance agent. This adviser will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they may have an incentive to recommend insurance products to you for the purpose of generating commissions.

Conversation Starter - Ask your financial professional:

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

You can find additional information about our conflicts of interest in Item 10 of our Firm Brochure.

How do your Financial Professionals Make Money?

Our financial professionals are compensated through a combination of salary and bonus. Salary, in some cases, is tied to the amount of client assets that the professional manages and services. Bonuses are discretionary and reflect the overall success of the firm and the individual. Our financial professionals receive no product sales commissions or other forms of payment.

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

Yes. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starter - Ask your financial professional:

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

Additional Information

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #114801. You may also contact our firm at (847) 670-4030 to request a copy of this relationship summary and other up-to-date information, or visit our website at arlington-wealth.com.

Conversation Starter - Ask your financial professional:

- *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?*

Exhibit A – Material Changes to Client Relationship Summary

The following material changes have been made to this brochure since the last version dated 03/12/2025:

- Services – this section has been updated to disclose that we offer consulting services on a fixed fee basis.
- Conflicts of Interest - this section has been updated to add conflict of interest disclosures for the outside business activities of Firm personnel. See Item 10 of our ADV Part 2A for further information.