

**Promus Capital, LLC**  
**Form CRS Disclosure**  
**March 31, 2022**

**Item 1. Introduction**

Promus Capital, LLC (“we”, “us” or “our”) 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 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.

**Item 2. Relationships and Services**

***What investment services and advice can you provide me?***

We offer both discretionary and non-discretionary investment advisory services, financial planning, reporting, and family office services to a variety of clients, including retail investors. These services are generally offered through separately managed accounts with custom asset allocations or pursuant to model portfolio strategies. We invest client assets in a wide variety of investment strategies and asset classes, including equities, fixed income, commodities, private funds and real assets. We also provide clients with access to third party managers, including managers of private funds affiliated with us. Accounts are tailored to address the specific goals, objectives, and constraints of each client. Where we provide discretionary investment advisory services, we have full discretion to select investments to buy and sell for a client’s account. In cases where we provide non-discretionary investment advisory services, clients are ultimately responsible for making investment decisions. Clients are permitted to impose reasonable restrictions on our trading authority.

**Monitoring:** As part of our standard service, we regularly monitor client accounts to ensure they are following their investment strategies and any imposed restrictions.

**Account minimums and other requirements:** All clients enter into an investment advisory agreement with us to open an account. We generally impose a minimum account size of \$10 million in investable assets, which we may waive in our discretion.

**Additional information:** For additional information, please see Items 4, 5, 7 and 13 in our Form ADV Part 2A brochure (available at <https://adviserinfo.sec.gov/firm/brochure/147597>).

***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?

**Item 3. Fees, Costs, Conflicts, and Standard of Conduct**

***What fees will I pay?***

**Principal Fees and Costs:** We are generally compensated for our investment advisory services, financial planning, reporting, and family office services as a percentage of assets under management, charged quarterly. Sometimes, we charge clients an annual fixed fee, charged quarterly, for some or all of such services provided to clients. The structure and level of our fees varies by client based upon the services provided and other factors deemed relevant by us. You should be aware that we have a financial incentive to encourage you to increase the assets in your account to increase the fees we receive and to recommend riskier trades, such as to make investments rather than hold cash, to increase our profitability. Our fees for investment advisory services, financial planning, reporting, and family office services are separate and distinct from the fees and expenses applicable to your accounts and investments including, for example, brokerage fees, custodial fees, account maintenance fees, fees related to mutual funds, and other transactional fees and product-level fees such as trading costs and management and incentive fees charged by the managers or sponsors of underlying investments, including affiliated private funds.

**Additional information:** 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.

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**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?

***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 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. We may recommend that you invest in proprietary products, that is, investments that are issued, sponsored, or managed by our affiliates. We have numerous affiliates that provide investment advisory services. Thus, we have an indirect financial incentive to recommend products managed by our affiliates because revenues earned by these affiliates from such products ultimately flow to our sole owner, Promus Holdings, LLC, or certain of its personnel. Our affiliates may receive fees such as management, monitoring, closing, transaction, structuring, board or similar fees from the underlying investments they manage. These fees are in addition to any fees clients pay us. Thus, clients may pay multiple layers of fees to us and our affiliates. We may also recommend that you make investments where the manager or sponsor of those investments shares with our affiliates revenue it earns on those investments. In addition, we may buy investments from or sell investments to you for our own accounts.*

**Conversation starter**

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

**Additional information:** For more information on conflicts of interest, please see Items 5, 10, 11 and 14 in our Form ADV Part 2A brochure (available at <https://adviserinfo.sec.gov/firm/brochure/147597>).

***How do your financial professionals make money?***

Our financial professionals receive a regular monthly salary and may be entitled to receive a discretionary bonus, based on numerous factors including overall performance returns of accounts they manage and on their ability to grow client assets. As permitted by applicable law, we compensate certain employees for business development activities, such as attracting or retaining client assets. As a result, our financial professionals may be incentivized to manage more accounts, encourage you to deposit more assets, or take greater risk in order to increase performance, or grow the assets they manage.

**Item 4. Disciplinary History**

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

No. Please visit [Investor.gov/CRS](https://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?

**Item 5. Additional Information**

If you have any questions about our investment advisory services or if you wish to request up-to-date information or a copy of the relationship summary, please contact us via telephone at 312-784-3990 or via email at [clientservices@promuscapital.com](mailto:clientservices@promuscapital.com). You can also find additional information about us on the SEC's website at <https://adviserinfo.sec.gov/firm/summary/147597>.

**Conversation starter**

- 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?