

# SPOKE REAL ESTATE FINANCIAL, LLC

June 15, 2020

# Form CRS - Customer Relationship Summary

### Item 1. Introduction

Spoke Real Estate Financial, LLC (the "firm," "us" or "we") is a broker dealer registered with the Securities Exchange Commission and a member of FINRA & Securities Investor Protection Corporation. 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 broker dealers, financials professionals and investment advisors at <a href="Investor.gov/CRS">Investor.gov/CRS</a>, 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 limit our recommendations to private placement products that we sell to customers, including retail investors. We do not open or maintain brokerage accounts. We do not monitor the activity, or investments of our customers. We act as a private placement agent for proprietary real estate syndications that are structured as direct participation programs. We only offer one private placement investment at a given time. There are investment qualifications and minimum investment amounts. All investments are offered by an official private placement offering memorandum which has investment information and disclosures and should be read carefully.

#### **CONVERSATION STARTERS:** *Ask your financial professional:*

Given my financial situation, should I choose a brokerage 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?

There is a onetime placement fee, or "concession", based on the number of units you purchase. The fee is clearly described in each offering memorandum for each private placement that we offer. This is the only investment transaction fee charged on the purchase. There are no other initial investment or ongoing direct investment fees or costs to you.

The underlying investment you make may incur other initial or ongoing fees and expenses, including offering expenses, management and service fees. In some instances, such fees and/or expenses may be paid to us or an affiliated entity for services provided as part of the offering or other services we perform with respect to the investment you make. 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. All such fees and expenses are disclosed in the offering memorandum and/or related materials incorporated therein.

### **CONVERSATION STARTER:** Ask your financial professional:

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 providing recommendations? How else does you firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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 about these conflicts because they can affect the recommendations, we provide you. Here are some examples to help you understand what this means:

### Examples of Ways We Make Money and Conflicts of Interest:

The firm and our affiliate, Spoke Management, LLC are both wholly-owned subsidiaries of our parent company, Spoke Real Enterprises, LLC. Spoke Management, LLC structures and manages the investment offerings, which we sell. Its primary focus is to form joint ventures with other developers who have expertise in particular segments of the real estate market. These joint venture partnerships then either acquire existing real estate properties or conduct ground-up developments. Once Spoke Management, LLC forms the partnerships, there becomes a need for outside investors to help finance these projects. Our firm will prepare and issue a private placement memorandum for the purpose of raising the necessary equity. You may purchase a membership unit from us, for which we earn a concession fee.

Our affiliate will also receive compensation based upon specific services performed. While such services will be performed at what are believed to be reasonable costs, such engagements are not "arm's length transactions" and pose a potential conflict of interest. Such compensation is described in the offering memorandum.

If we are unable to sell private placement investments, we will not receive compensation directly (concessions) or indirectly (other fees and expense). A successful investment offering, both initially and on an ongoing basis, is beneficial to the firm from a financial as well as reputational perspective.

# **CONVERSATION STARTER:** Ask your financial professional:

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

# How do your financial professionals make money?

Michael Levin, the firm's sole registered person, is also a majority owner of our parent company. Each transaction earns us a placement fee which Mr. Levin participates indirectly through ownership of the firm and affiliated entities.

### **Item 4. Disciplinary History**

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

No. Neither our firm nor Mr. Levin have any legal or disciplinary history. Visit <u>Investor.gov/CRS</u> for a free and simple search tool to research us and our financials professionals.

## **CONVERSATION STARTER:** Ask your financial professional:

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

## **Item 5. Additional Information**

To obtain additional information about our brokerage services and request a copy of the relationship summary contact Michael Levin at <a href="mailto:mlevin@spokerecap.com">mlevin@spokerecap.com</a> or (614) 296-3587.

### **CONVERSATION STARTERS:** Ask your financial professional:

Who is my primary contact person? Is he a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?