



O'Dell Capital Management
a Registered Investment Adviser

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Form ADV Part 3

We are registered with the SEC as an investment adviser. Brokerage and investment advisory services 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 <http://investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers and investing.

Relationships and Services

What investment services and advice can you provide me?

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A (“Disclosure Brochure”). Our services include portfolio management, investment analysis and financial planning, retirement planning, and financial planning-focused estate planning for individuals and high net worth individuals. As part of our standard services, we monitor investments that we manage on a continuous and ongoing basis. Financial planning and investment consulting recommendations are not actively monitored. There are no material limitations to our monitoring. We accept discretionary authority to implement the recommended transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. We do not offer advice only with respect to proprietary products. Where appropriate, we provide advice about any type of legacy position or other investment held in your portfolio; however, you should not assume that these assets are being continuously monitored or otherwise advised on by us unless specifically agreed upon.

Additional information about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and available to all clients or by going here: www.adviserinfo.sec.gov.

Let’s discuss... 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?

Fees, Costs, and Standards of Conduct

What fees will I pay?

The fees for these types of services are negotiated between the client and the Firm. O’Dell Capital Management offers investment and wealth management services for an annual fee based on the amount of assets under the Firm’s management. This management fee varies between 75 and 150 basis points (0.75% – 1.50%), based upon the size and complexity of a client’s account, as well as the specific services such client will utilize.

In addition to the advisory fees paid to us, you also incur certain charges imposed by other third parties, such as broker-dealers, third-party money managers and custodians. These charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by independent managers, margin costs, charges imposed directly by a mutual fund or ETF in a client’s account as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

. 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.

Additional information about our fees can be found in Item 5 of our Disclosure Brochure and available to all clients or by going here: www.adviserinfo.sec.gov.

Let's discuss... Help me understand how these fees and costs might affect my investments. If I give you \$200,000 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 are obligated 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. The following is an example to help you understand what this means:

- Our firm and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. In such circumstances, our firm or its investment adviser representatives may have a financial interest in recommending investments that our firm or its representatives also own.

Let's discuss... How might your conflicts of interest affect me, and how will you address them?

Additional information about our conflicts of interest can be found throughout our Disclosure Brochure and available to all clients or by going here: www.adviserinfo.sec.gov.

How do your financial professionals make money?

Our financial professionals are compensated based on the following factors and conflicts of interest:

Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.

Do you or your financial professionals have legal or disciplinary history? For what type of conduct?

No, neither we nor our financial professionals have a legal or disciplinary history. You can visit <http://investor.gov/crs> for a free and simple search tool to research us and our financial professionals.

Let's discuss... As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

To obtain additional information regarding our services or to request a copy of this relationship summary, please contact Denise Young at 937-393-3154.

Let's discuss... 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?

Our Firm and its representatives have a fiduciary duty to all clients. Please call Denise Young at 937-393-3154 if you have any concerns.