

## CRS Client Relationship Summary

### TGA Capital Management Introduction

TGA Capital Management is an Investment Adviser registered with the Securities and Exchange Commission (“SEC”) and the state of Massachusetts, the Division of Securities.

TGA Capital Management is obligated to ensure you understand our commitment to maintaining a strict fiduciary relationship with you. Our selection of the institutional custodian, Charles Schwab and Company, Incorporated.

There are free and simple tools available to research firms and financial professionals at [www.investor.gov/crs](http://www.investor.gov/crs), which also provides educational materials about investment advisers, Registered Investment Advisers.

What investment services and advice can you provide me?

TGA Capital Management offers active investment portfolio management and investment advisory services, including portfolio allocation. Investment management tailored for individuals, Trusts, company-sponsored plans, 401(k), IRA, Roth IRA, Deferred Compensation, plan administration for corporate sponsored plans, retirement, college planning, estate planning, risk/averse review, and individual financial planning.

If we are providing investment management services to you, we will get your accounts set up either electronically or by paper copies. We will invest your account in understandable and appropriate investments. We will educate you on how to gain access to your accounts via our systems as well as the custodian. We will regularly monitor your investments on a daily, weekly, monthly and quarterly basis, as part of our standard services.

Please refer to Item 4 of our Form ADV Part 2A for further information.

We manage accounts on a discretionary basis under strict fiduciary duties, which means we do not need to call you when buying or selling investments in your account. You will execute an investment management agreement and a limited power of attorney authorizing us to act on your behalf. This agreement will remain in place until you or we terminate our relationship. Please refer to Item 16 of our Form ADV Part 2A for further information.

We do not limit our advice and services to proprietary products or a limited menu of products or investments. We do not recommend any financial product or products that provide TGA Capital Management any commission, or economic benefit. Our services are strictly of a fee base schedule as described in our financial service agreement with you.

We do have a minimum account size requirement, but can be waived in the relationship.

TGA Capital Management services are designed and best suited for individuals, professionals, business owners, corporate plan sponsors, and trust entities.

Please refer to our Form ADV Part 2A for further information.

Questions to Ask Us:

- 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?

TGA Capital Management's fee structure is clear and concise. As the portfolio's account value increases, the fee decreases. This is known as a tiered fee schedule on behalf of the advisory client member.

Fees and costs affect the value of your account over time; they vary based on certain factors and are subject to negotiation. We will provide personalized information regarding the fees and costs you will pay, which may be negotiated and set forth in our financial services agreement.

TGA Capital Management provides investment and wealth management services on a quarterly basis, based upon a percentage of the market value of the assets being managed by the Firm. The annual fee is prorated and charged quarterly, in arrears, based on the market value of the assets managed by TGA Capital Management as of the last day of the previous month or quarter.

Financial Planning may be provided on a separate fixed-fee basis, within a range, and may be included as part of your managed accounts, and/or, depending on complexity.

The institutional custodian (Charles Schwab) that holds your assets can charge you a transaction fee when we buy or sell an investment for you. These transaction fees are in addition to our advisory fee. TGA Capital Management, in our research, recommends a transaction-free allocation when it is appropriate or available for your managed portfolio. You could also pay fees charged by the custodian for certain investments and for maintaining your account. We do not recommend certain investments, such as commission-based mutual funds and exchange-traded funds that may include additional fees as part of the offering. We may also waive our fee to offset third-party providers, and this will be fully disclosed to you.

Account statements are provided by the custodian monthly, and the quarterly statement reflects the managed account fee. Portfolio reporting is provided quarterly and includes the advisory fee disclosure. The ADV PTII revisions are provided annually, and financial services agreements are provided at inception with TGA Capital Management.

Please ensure you understand the fees and costs you are paying.

Please refer to Item 5 of our Form ADV Part 2A for further information.

Form ADV Part 3 – Relationship Summary Page 1 of 2 TGA Capital Management.

When we act as your investment adviser, we must act in your best interests and put your interests first. TGA Capital Management's approach, as your fiduciary, takes every precaution to avoid any conflict of interest in the active management of your financial matters, which we manage or service.

TGA Capital Management is compensated on a strict fee-only agreement, and we do not accept commissions or any other economic benefit. As your Registered Investment Advisor, we adhere to the fiduciary duty owed to our advisory client members in our capacity as their Registered Investment Advisor. Our standard is to be completely transparent while assigned to work on the advisory client's behalf.

Here is an example to help you understand what this means. TGA Capital Management's revenue is derived from advisory fees collected from our clients' accounts each quarter.

We avoid any and all third-party providers that offer incentives to increase the amount of investments we manage, thereby minimizing or avoiding any bias in our advice toward investing more rather than paying off debt or recommending that you hold investments we do not manage.

Our recommendations are based on current research, supported by fundamental and technical research, financial analytics, financial filings, Form 10-K and Form 10-Q, SEC filings, and other reliable sources, including Morningstar, Moody's, CFR, Bloomberg, Argus, JP Morgan, Goldman Sachs, Pimco, Money.Net, Schwab Ratings, The FED Beige Book, and other financial-related public and private publications.

Our research also encompasses ongoing sectoral analyses and economic research, which are applied continuously.

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

No, our firm and/or financial professionals do not have legal and/or disciplinary history.

Visit [www.investor.gov/crs](http://www.investor.gov/crs) for a free and simple search tool to research our firm and our financial professionals.

Additional Information;

You can find additional information about our investment advisory services on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD # 131629.

You may also contact our firm at 508-224-9646 or email us at [mgreen@tgacapitalmanagement.com](mailto:mgreen@tgacapitalmanagement.com) to request a current copy of our Form ADV Part 2 or up-to-date Form ADV Part 3 – this relationship summary.

Questions to Ask Us: • 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 -

Changes Since the last filing of this Form ADV Part 3, dated 12/31/2025 and filed January 2026, we have updated the disclosure regarding where to find additional information.

*Michael D. Green,*

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*TGA Capital Management*

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*Member FPA, Financial Planning Association*

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