

April 20, 2022

Prevail Capital, LLC “**Prevail**” is registered with the Securities and Exchange Commission (“**SEC**”) as a broker-dealer. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. This Client Relationship Summary provides details about our brokerage services, fees, and other important information.

Free and simple tools are available for investors to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS). Here, you can also find educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Prevail offers brokerage services to retail investors. Prevail is a boutique broker-dealer that specializes in EB-5 investment securities transactions. Retail investors may select their own investments or Prevail may recommend products to consider.

- Prevail reviews open and performing products and requests updates until a product is closed but we do not monitor the performance of your investment. Unless we agree otherwise, we are not required to monitor your investment on an ongoing basis.
- You may select investments or we may recommend investments for you to consider, but the ultimate investment decision for your investment strategy and purchase or sale of investments will be yours.
- Prevail can offer and sell various private placement products but our core business is derived from the offer and sale of EB-5 investment securities transactions, consequently the investment selection is limited. Other firms could offer a wider range of choices, some of which might have lower costs.
- Investments offered through Prevail may require you to be an accredited investor. Each product has a minimum purchase amount. In the case of EB-5 securities transactions, the minimum capital required to be invested is currently \$800,000 plus Administrative Fees and associated Non-investment Expenses.

Conversation Starters - Ask your financial professional these questions to learn more:

- *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?*

For additional information, please visit www.prevailcapital.com.

What fees will I pay?

- *Help me understand how these fees and costs might affect my investments. If I give you \$800,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

EB-5 investment securities transactions currently require a minimum “Capital Investment Amount” of \$800,000. The entire \$800,000 is required to be applied to the project it is funding. In addition to the Capital Investment Amount, EB-5 practitioners will charge and collect from investors certain fees that may be referred to as “**Administrative Fees**”. Administrative Fees will vary between products. Prevail receives compensation as a transaction based fee, generally referred to as a commission, when you buy an investment. Our fees vary and are negotiable.

EB-5 investors will also need to budget for “**Non-investment Expenses**” for legal representation and petition filing costs associated with EB-5 investments. Prevail does not receive any compensation from Non-investment Expenses.

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.

For additional information, please contact Prevail directly. Compensation does vary. The fees that Prevail receives are disclosed in the private placement memorandum for each investment offered and sold through Prevail.

What are your legal obligations to me when providing recommendations? How else does your 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 us about these conflicts because they can affect the recommendations we provide you.

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

Here are some examples to help you understand what this means.

- Prevail is paid indirectly by the investor from the Administrative Fees received by the EB-5 practitioner. The amount you pay may also depend on an EB-5 practitioner agreeing to collect a reduced Administrative Fee if our fee has been negotiated. In addition, Prevail receives fees paid by the issuer of EB-5 securities at their cost for services rendered to the issuer.
- Prevail has a limited selection of investments and many of the investments offered and sold by Prevail are affiliated with a common issuer of securities. Accordingly our interests can conflict with your interests. When we provide recommendations, we must eliminate those conflicts or tell you about them and in some cases reduce them.
- **For additional information**, please contact Prevail directly. Conflicts of interest are disclosed in the private placement memorandum for each investment offered and sold through Prevail.

How do your financial professionals make money?

Our financial professionals are compensated in cash from the fees received by Prevail. Different products sold can result in different levels of compensation.

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

No.

You can visit Investor.gov/CRS for a free and simple search tool to research our firm and financial professionals.

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

For additional information about Prevail or to request a copy of this relationship summary please visit www.prevailcapital.com. You may also call +1 (239) 234-1169 to request up to date information or a copy of this relationship summary.

Ms. Lisa V. Hulme is the owner, a principal, and CEO of Prevail Capital. Lisa holds the following securities licenses, Series 7, 24, 22, 39, 63, and SIE. Lisa has been a licensed person since 2012 and continuously with Prevail since 2013.

▪ *Who is my primary contact person? Is he or she 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?*