

## Item 1 – Introduction

Steginsky Capital, LLC (“we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a Registered Investment Adviser (“RIA”). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS). The site 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 provide investment advisory services, including discretionary investment management and limited planning and consulting services, to individuals, high net worth individuals, trusts, and estates (our “clients”).

We manage investment assets consistent with our general investment philosophy, which means that most client relationships begin with an evaluation of whether our methodology is consistent with the client’s individual circumstances and objectives. When a client engages us to provide investment management services, we shall monitor, on an ongoing basis, the investments in the accounts over which we have investment authority. When engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s). Our investment authority over your account(s) shall continue until our engagement is terminated.

In limited circumstances upon specific client request, we may also provide limited financial planning and consulting services. When a client engages us to provide these limited planning and consulting services, we rely upon the accuracy of information provided by the client and/or other professionals for our review, and do not verify or monitor any such information while providing our services. Our limited consulting services are completed upon the communication of our recommendations to the client.

We do not have to limit the type of securities we trade for clients to proprietary products or a limited group or type of investment, but we manage portfolios containing individual equity securities, which represent an ownership interest, or the right to acquire an ownership interest, in an issuer. Equity securities also include, among other things, common stocks, preferred securities, convertible stocks and warrants. While we may provide investment advice regarding many different types of investments, our clients’ managed accounts will normally contain a relatively small number of securities positions and may not constitute a fully diversified or balanced portfolio that is suitable for investment of all of their investment assets. For example, the portfolios we manage generally do not contain fixed-income investments. We therefore manage client accounts without consideration to the other investment assets that we are not managing.

We generally do not impose a minimum annual fee or minimum asset level for our investment advisory services.

**Additional Information:** For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7, respectively in our [ADV Part 2A](#).

### *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?*

We provide our investment advisory services on a fee-only basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our “AUM Fee”). Our annual AUM Fee is negotiable and shall generally range from 0.50% to 1.00% of client assets, depending on a number of factors including the dollar amount of assets placed under our management, the representative assigned to the account, the complexity of the overall engagement, and other factors. We typically deduct our AUM Fee from one or more of your investment accounts, in advance, on a quarterly basis. To the extent requested by the client, limited planning and consulting services may be provided in conjunction with investment management, for no additional fee.

**Other Fees and Costs:** Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). These charges will be assessed in accordance with the qualified custodian’s transaction

A copy of our Form ADV Part 2A is available at:

[https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd\\_iapd\\_Brochure.aspx?BRCHR\\_VRSN\\_ID=705890](https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=705890)

fee/brokerage commission fee schedule. The qualified custodian may also charge certain administrative fees, including wire transfer fees, account maintenance fees, and account transfer fees. In addition, relative to certain mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund 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.

*Conversation Starters:*

*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?*

**Additional Information:** For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [ADV Part 2A](#).

***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 a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.
- \* We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee, which could have the effect of increasing our compensation.

*Conversation Starters:*

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

**Additional Information:** For more detailed information about our conflicts of interest, please review our [ADV Part 2A](#).

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

Our financial professional is an equity owner of the firm, who stands to receive a share of the firm's profits that can be but are not necessarily based on the acquisition of new clients and their growth of assets. This presents a conflict of interest, because it could incentivize our financial professional to recommend that you place additional assets under our management. We mitigate that conflict by adhering to our fiduciary duty when making investment recommendations, so that we only make recommendations in conformity with each client's investment objectives and savings strategy. You should discuss your financial professional's compensation directly with your financial professional.

#### **Item 4 – Disciplinary History**

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

No. We encourage you to visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

#### **Item 5 – Additional Information**

Additional information about our firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may contact our Chief Compliance Officer, Andrew Steginsky, at any time to request a current copy of our [ADV Part 2A](#) or this Form CRS. Our Chief Compliance Officer may be reached by phone at (212) 683-1700.

*Conversation Starters:*

*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?*

A copy of our Form ADV Part 2A is available at:

[https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd\\_iapd\\_Brochure.aspx?BRCHR\\_VRSN\\_ID=705890](https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=705890)