

Client Relationship Summary (Form CRS)

Capital Insights Group of WNY, LLC. – March 31, 2024

Introduction

Fees and services from brokerage and investment advisory firms vary, so it is important for you to understand the differences. We are not a brokerage firm. Capital Insights Group of WNY, LLC. is an investment advisor registered with the Securities and Exchange Commission. There are free and simple tools available for you to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS) – which also provides educational materials about broker-dealers, investment advisers, and investing. This document outlines a summary of the types of services we provide and how we charge for those services.

What investment services and advice can you provide me?

We offer financial planning and investment management services to retail investors including individuals, families, small businesses, trusts, estates, and charitable organizations. We will meet with you to understand your current financial situation, investment goals, planning objectives, time horizon, risk tolerance, income tax situation, and liquidity needs...and will then provide you with recommendations based upon your overall best interest.

We will monitor your portfolio on a regular basis and can manage your accounts on a “discretionary” or “non-discretionary” basis. If we manage your account on a *discretionary* basis, we’re allowed to buy and sell investments in your account, in accordance with your investment objectives, without asking you in advance. If we manage your account on a *non-discretionary* basis, we provide recommendations, but you are ultimately responsible for making the decision on what to buy or sell. Any limitations will be described in the signed investment advisory agreement. We do not impose a strict minimum account size requirement for our investment management services.

When constructing client portfolios, we primarily use no-load or load-waived mutual funds (which do not charge a commission or sales charge), exchange-traded funds, closed-end funds, individual stocks, individual bonds, exchange-listed limited partnerships or master limited partnerships, and various exchange-traded trust arrangements. This is not a comprehensive list of every investment vehicle available to investors, so other firms may offer advice on a wider range of choices – which may have higher-, or lower-, costs.

If you are only engaging our firm for financial planning services, we will work with you to review your held away investment accounts, and can provide you advice on those assets, but we will not be monitoring or reviewing those held away accounts, unless otherwise agreed upon as part of your financial planning engagement.

Additional Information can be found in our Form ADV Part 2A, specifically – Item 4 (Advisory Services), Item 5 (Fees and Compensation), Item 7 (Types of Clients), and Item 13 (Review of Accounts).

Key Questions to Ask:

1. *“Given my financial situation, should I choose an investment advisory service? Why or why not?”*
2. *“How will you choose investments to recommend to me?”*
3. *“What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?”*

What fees will I pay?

If you open an advisory account, you will pay an ongoing, monthly, asset-based fee, deducted directly from your portfolio, based upon the value of the cash and securities in your portfolio. This applies regardless of whether any assets were bought or sold in the account during the preceding month. If you engage us for financial planning services, we will charge a fixed fee for the development of a financial plan – which varies based on complexity.

In most cases, the amount paid to our firm does not vary based on the types of investments we select on your behalf. We are paid for investment management services based on a percentage of your account value. Therefore, the more assets you have in an advisory account, including cash, the more you will pay us. This creates a financial incentive for us to encourage you to increase the assets in your account. This creates a conflict of interest; however, we mitigate this by ensuring all recommendations and investment decisions we make are in your best interest.

Our fees are exclusive of any additional expenses which you may incur including transaction fees, custodial expenses, taxes, and internal (fund-level) expenses relating to the underlying securities in the portfolio. These fees are not assessed by our firm and are not payable to our firm.

Given that our fee for managing a portfolio is percentage-based – if your portfolio decreases in value, you pay us less; if it increases in value, you pay us more. However, 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.

Key Question to Ask: “Help me understand how these fees and costs might affect my investments. If I give you \$100,000 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 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:

- If you open an advisory account with us, we will recommend that you open it with a specific custodian, where we maintain an institutional relationship and receive economic benefits. This presents a conflict of interest and can influence our recommendation of the custodian to you. However, you ultimately decide where to open your accounts. Choosing a different custodian could result in the loss of quality of service and/or ability to obtain favorable prices.
- If you open an advisory account with us, our fees for the investment advisory services provided are based on assets under management, so a conflict of interest could exist if we recommend that you keep your assets under our management rather than remove your assets from our management. Depending on a client’s given circumstances we may recommend that a client roll over (transfer) retirement plan assets to an Individual Retirement Account (IRA) managed by us. As a result of a rollover, we may earn fees on those accounts. This presents a conflict of interest, as we have a financial incentive to recommend that a client roll over retirement assets into an IRA we will manage. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code.

Key Question to Ask: “How might your conflicts of interest affect me, and how will you address them?”

Additional Information can be found in our Form ADV Part 2A, specifically – Item 10 (Other Financial Industry Activities and Affiliations), Item 12 (Brokerage Practices), and Item 14 (Client Referrals and Other Compensation).

How do your financial professionals make money?

Our financial professionals are compensated based on revenue from the advisory services provided (ie. financial planning) and assets under management from clients they service. Our financial professionals do not sell financial products; do not receive commissions; do not get additional compensation for choosing one asset over another; and do not get rewarded for making trades or transactions.

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

No. You can visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Key Question to Ask: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information can be found in our Form ADV Part 2A. If you would like additional information or have any other questions, please contact our President and Chief Compliance Officer, Christopher R. Cinelli. He can be reached via email at chris@cigwny.com, or by phone at (716) 309-1409.

Key Question to Ask: 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?