

FORM ADV PART 3 – CLIENT RELATIONSHIP SUMMARY (FORM CRS)
ATEGENOS CAPITAL, LLC (JANUARY 31, 2024)

Ategenos Capital, LLC (“Ategenos”, “we”, “us” and “our”) is registered with the Securities and Exchange Commission as an investment adviser. Investment advisory and brokerage services and fees differ, and it is important that a retail investor (“you”) understand the differences. Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We provide investment advisory services to you in connection with a wrap fee or investment advisory program sponsored, organized, and administered by your financial intermediary (“Advisory Firm”) or by Ategenos. Our advisory services to you vary in terms of investments allowed by your Advisory Firm or available in the Ategenos Wealth Platform, as well as relevant minimum account size and other variables, as determined by Advisory Firm or Ategenos.

Within Advisory Firm programs, you may select an Ategenos model portfolio, or our Private Wealth solution managed by us where we provide asset allocation, investment strategy selection, and certain investment management services with respect to securities on a discretionary basis and in accordance with the investment guidelines provided to us, and any reasonable restrictions requested by you. Your Advisory Firm financial representative and/or designee is responsible for ongoing account monitoring to underlying accounts accessing our models.

Within the Ategenos Wealth Platform, we provide an investment advisory program offering various services and provide ongoing monitoring of model portfolios and accounts. You and your Advisory Firm financial representative are responsible for establishing the financial circumstances, investment objectives, and investment restrictions applicable to you. We are not responsible for, and do not attempt to determine, whether a particular third-party wrap fee or advisory program is suitable or advisable for you. Within the Ategenos Wealth Platform, you may have the ability to choose from various discretionary advisory programs utilizing third-party investment strategies and/or Ategenos investment strategies to meet your needs which is determined by your Advisory Firm financial representative. The Advisory Firm has the right to terminate their relationship with us. For additional information, please see Items 4 and 7 in our Form ADV, Part 2A Brochure, available at www.ategenoscapital.com/disclosures.

Conversation Starters. Ask your financial professional.

- 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 those qualifications mean?

What fees will I pay?

Ategenos is retained as an investment adviser by your Advisory Firm in a wrap fee or model-based program or through the Ategenos Wealth Platform. Asset-based fees associated with wrap fee programs will include most transaction costs and fees to a broker-dealer or custodian that has custody of these assets, and therefore may be higher than a typical asset-based advisory fee. If an asset-based fee is charged, the more assets invested in your account, the more you will pay in fees, and the Advisory Firm or Ategenos therefore have an incentive to encourage you to increase the assets in your account. The fees you pay for the wrap program are as agreed upon between you and your Advisory Firm. For advisory services, we are paid an asset-based fee that is a portion of the wrap program fee that is agreed upon between us and the Advisory Firm and/or their delegate. Our advisory fees for managing your account can be less than the fee we receive for managing similar accounts outside of a wrap program, which could cause us to favor other accounts where we earn a higher fee.

In a wrap fee program, you can also be subject to additional fees and expenses including transaction fees such as commissions or dealer mark-ups or mark-downs on principal transactions, product-level fees on mutual funds and ETFs, and other costs imposed by the Sponsor, third-party, or custodian such as odd-lot differentials, exchange fees and transfer taxes. You also could incur additional brokerage fees and expenses if trades are executed outside the wrap fee program platform.

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

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you are paying. For additional information, please see Item 5 of our Form ADV, Part 2A Brochure, available at www.ategenoscapiat.com/disclosures.

Conversation Starters. Ask your financial professional.

- 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?

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 does create certain conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice that we provide you. Here are some examples to help you understand what this means:

- Ategenos charges an asset-based fee which means the more assets invested with our investment products, the more you will pay in fees.
- Ategenos makes recommendations relative only to its own proprietary models; we are incentivized to recommend these products to you. There may be products not offered to you by Ategenos which have lower fees or are more suitable for you.
- Ategenos may have a conflict where we recommend an investment product of asset managers that are our clients or any investment strategy or service managed by or an affiliate of, Envestnet, Inc. a non-controlling investor in Ategenos.

For additional information, please see our Form ADV, Part 2A Brochure at www.ategenoscapiat.com/disclosures.

Conversation Starters. Ask your financial professional.

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

For more detailed information about our conflicts of interest, please see our Form ADV, Part 2A Brochure, available at www.ategenoscapiat.com/disclosures.

How do your financial professionals make money?

Our financial professionals that manage portfolios are compensated by a salary and may receive a discretionary bonus based on the success of the firm or their contributions. Our financial professionals may also participate in an equity incentive plan.

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

No. Please visit www.investor.gov/crs for a free and simple search tool to research us and our financial professionals.

Conversation Starters. Ask your financial professional.

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

Additional information about our investment advisory services and a copy of this relationship summary can be found at www.ategenoscapiat.com/disclosures and requested at 1-800-461-3205. While we can answer questions about the advisory services provided to the portfolio we manage on your behalf, additional information about your account can be provided by contacting the Sponsor's financial professional.

Conversation Starters. Ask your financial professional.

- 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?