

### Introduction

Our firm, **Ciro Capital LLC**, is an investment adviser registered with the Securities and Exchange Commission. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. 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, broker-dealers, and investing.

### What investment services and advice can you provide me?

We are a registered investment adviser that offers investment advisory services, including Comprehensive Portfolio Management and Financial Planning & Consulting, to clients. If you open an advisory account with our firm, we'll meet with you to understand your current financial situation, existing resources, objectives, and risk tolerance. Based on what we learn, we'll recommend a portfolio of investments that is monitored at least annually, and if necessary, rebalanced to meet your changing needs and goals. We'll offer you advice on a regular basis and contact you at least annually to discuss your portfolio.

You can select in our agreement whether we are allowed to buy and sell investments in your account without asking you in advance ("discretion") or only after receiving your permission ("non-discretion"). If non-discretion is selected, you make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. We will have discretion or non-discretion until the advisory agreement is terminated by you or our firm.

We do not restrict our advice to limited types of products or investments.

Our firm does not impose requirements for opening and maintaining accounts or otherwise engaging us.

Financial Planning & Consulting is included in our Comprehensive Portfolio Management service for no additional fee. Financial Planning & Consulting is also offered as a separate service for an hourly fee. We do not monitor your investments for the Financial Planning & Consulting service.

*Additional information about our advisory services is in Items 4 & 7 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/329576>.*

### 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 is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?

### What fees will I pay?

You will be charged an ongoing annual fee applied quarterly based on the value of the assets in your account. Our maximum Comprehensive Portfolio Management advisory fee is 2.00% per annum, including any fees associated with the Third Party Managers in the portfolio. In general, the more assets you have in your advisory account, the more you will pay us in fees. We therefore have an incentive to increase the assets in your advisory account. Our fees are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. Our firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account.

Our maximum hourly rate is \$500 for our Financial Planning & Consulting service. We charge an upfront retainer when you sign an agreement for this service or charge you when we provide a financial plan or consultation.

The custodian that holds your assets may charge you a transaction fee when we buy or sell an investment for you. The custodian's transaction fees are in addition to our firm's fees for our Comprehensive Portfolio Management service.

You may also pay charges imposed by the custodian holding your accounts for certain investments and maintaining your account. Some investments, such as mutual funds, index funds, exchange traded funds, and

variable annuities, charge additional fees that will reduce the value of your investments over time. In addition, you may have to pay fees such as “surrender charges” to sell certain illiquid securities.

In certain cases, we select third party money managers, sub-advisers, and/or separate account managers to assist us with managing your account. If selected, they will charge you a fee, which will be described to you in their Form ADV and/or agreement. Under no circumstances will the total fees charged exceed 2.00% per annum.

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.

*Additional information about our fees is in Item 5 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/329576>.*

**Questions to Ask Us:**

- Help me understand how these fees and costs may 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 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:*

Our firm’s financial professionals include licensed insurance agents and broker-dealer registered representatives who sell commission-based investment products and insurance. They have an incentive to recommend commission-based products to you in order to increase their compensation.

*Additional information about our conflicts of interest is in Item 10 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/329576>.*

**Questions to Ask Us:**

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

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

Our financial professionals are compensated based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, and the time and complexity required to meet a client’s needs.

Our firm will receive ACAT and transition fees from our custodian, Charles Schwab and Co., Inc.

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

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Questions to Ask Us:**

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

**Additional Information**

You can find additional information about our firm’s investment advisory services on the SEC’s website at [www.adviserinfo.sec.gov](https://www.adviserinfo.sec.gov) by searching CRD #329576. You may also contact our firm at (646) 785-6201 to request a copy of this relationship summary and other up-to-date information.

**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?