

**S. WILLIAMS CAPITAL, LLC**  
**Form CRS**  
**November 21, 2024**

<b>Introduction</b>	<p>This document summarizes the advisory services S. Williams Capital, LLC (“SWC,” “we,” “our,” or “us”) provides to retail investors as an investment adviser registered with the Securities and Exchange Commission (“SEC”). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to help you research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<b>What investment services and advice can you provide me?</b>	<p>SWC provides investment advisory services on a <b>discretionary</b> basis, which means SWC buys and sells securities in your account without asking you in advance. The minimum required to open an account is \$50,000, subject to waiver, reduction, or increase at SWC’s discretion.</p> <p><i>For additional information</i>, please see SWC’s Form ADV Part 2A: Firm Brochure (“SWC Firm Brochure”), Items 4, 5, 7, 16, and 17.</p> <p><b>Ask your financial professional—</b></p> <ul style="list-style-type: none"> <li>• <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i></li> <li>• <i>How will you choose investments to recommend to me?</i></li> <li>• <i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i></li> </ul>
<b>What fees will I pay?</b>	<p>As an investor with SWC, you will pay an annual management fee of 1.0%, which is deducted quarterly. Management fees are calculated as a percentage of the daily account value and are payable at the end of each calendar quarter. Management fees will be adjusted for any contributions or withdrawals made during a calendar quarter. SWC has the ability to waive or reduce the management fee.</p> <p>If you are a qualified client, you may also be subject to a performance-based fee of 10% of net profits. Performance-based fees are deducted at the end of the calendar year or at the time a qualified client terminates the advisory relationship. Performance-based fees are not charged until all prior net losses in your account have been recouped. SWC has the ability to waive or reduce the performance-based fee.</p> <p>In addition to these fees, you should also expect to cover various third-party fees, including brokerage fees, custodian fees, and trading commissions. These fees are separate from the fees charged by SWC.</p> <p><b>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.</b></p> <p><i>For additional information</i>, please see the SWC Firm Brochure, Items 5 and 6.</p> <p><b>Ask your financial professional—</b></p> <ul style="list-style-type: none"> <li>• <i>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?</i></li> </ul>

<p><b>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?</b></p>	<p><i><b>When we act as your investment adviser,</b></i> 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 interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.</p> <p>SWC and related persons invest in the same securities that SWC selects for investor accounts. SWC believes its investors are best served when its principal is invested side-by-side with investors. SWC will often purchase or sell securities for affiliated accounts at or around the same time that it purchases or sells such securities for investor accounts. In the event affiliated accounts participate, a conflict of interest may arise regarding trade execution and/or allocation. SWC attempts to address the potential conflict of interest through various compliance policies that seek to treat all investors fairly and equitably.</p> <p><i><b>For additional information,</b></i> please see the SWC Firm Brochure, Items 6, 7, 11, 12, and 17.</p> <p><b>Ask your financial professional—</b></p> <ul style="list-style-type: none"> <li>• <i>How might your conflicts of interest affect me, and how will you address them?</i></li> </ul>
<p><b>How do your financial professionals make money?</b></p>	<p>SWC’s financial professionals earn money through the management fees and performance-based fees discussed in the section above titled, “What fees will I pay?” Importantly, neither SWC nor its supervised persons accept any compensation for the sale of securities or other investment products.</p>
<p><b>Do you or your financial professionals have legal or disciplinary history?</b></p>	<p><b>No.</b></p> <p>Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p><b>Ask your financial professional—</b></p> <p><i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i></p>
<p><b>Additional Information</b></p>	<p>For additional information about SWC’s investment advisory services or to request a copy of this document, please call 646-375-5325.</p> <p>Additional information about SWC, including the SWC Firm Brochure, is also available on the SEC's website at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.</p> <p><b>Ask your financial professional—</b></p> <ul style="list-style-type: none"> <li>• <i>Who is my primary contact person?</i></li> <li>• <i>Is he or she a representative of an investment adviser or a broker-dealer?</i></li> <li>• <i>Who can I talk to if I have concerns about how this person is treating me?</i></li> </ul>