



Client Relationship Summary – March 1, 2024

Gravity Capital Management, LLC (“GCM” or “we”) is registered as an investment adviser with the U.S. Securities and Exchange Commission (“SEC”). Our fees and services differ from brokerage fees and it is important for you to understand the differences. Free and simple tools to research investment adviser firms and their individuals are available at [Investor.gov/CRS](https://www.investor.gov/crs). There you can learn about investment advisers, broker-dealers and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. We provide investment advice and portfolio management involving a broad range of financial instruments. Prior to onboarding you as a client, we work with you to determine mutual investment suitability. Once you become a client, we monitor your investments on a day-to-day basis. We expect to invest in mainly long positions in publicly traded equity securities in U.S. and non-U.S. issuers. In certain circumstances, investments in short positions and options on financial indices and individual securities may be used to hedge your investments.

We typically manage investment portfolios on a discretionary basis where we will determine the investments to buy and sell in your account on an ongoing basis.

In certain circumstances, we may advise your account on a non-discretionary basis. You may formally request certain restrictions relating to your investment.

Generally, we do not require a minimum initial and ongoing account size for investment advisory services. For more specific information about the services we provide, please refer to Item 4 and Item 7 of our Form ADV, Part 2A filing, [found here](#).

Conversation Starter:

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?

What fees will I pay?

We charge you a percentage of your account value. We generally receive compensation based on a percentage of assets under management. We charge the investment management fee by calculating the market value of the assets on the last day of each quarter. In some cases, the method by which fees are calculated may be different, depending on the brokerage firm where your account is custodied. In certain instances we charge a fixed fee for consulting services.

- **Other Fees and Costs:** Brokers may charge transaction fees on purchases or sales of certain securities. These transactions are usually small and incidental to the purchase or sale of a security. Additional applicable fees may be borne in the normal course of business. We do not participate in a wrap fee program.



- **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 Starter:

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?

For more information about how we bill, please refer to Item 5 of our Form ADV, Part 2A, [found here](#).

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 must 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.

- Since our revenue is based on the amount of assets we manage, we have an incentive to encourage you to increase your assets under management. This represents a conflict of interest.
- We do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

Conversation Starter:

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

For more information about potential conflicts of interest, please refer to Item 10 and Item 11 of our Form ADV, Part 2A, [found here](#).

How do your financial professionals make money?

The financial professional's source of compensation is from fees collected from our clients as discussed above. For more information on the fees we charge, please refer Item 5, in Part 2A of our Form ADV filing, [found here](#).

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

No. We do not have any legal or disciplinary history. Please visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professional.

For additional information about our services, or to request up-to-date information and a free copy of this CRS, please call Gravity Capital Management, LLC at (917)-558-4968.

Conversation Starter:

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

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?