

Item 1 – Introduction

Steginsky Capital LLC (“we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a Registered Investment Adviser (“RIA”). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 – Relationships and Services

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary investment advisory services to individuals, high net worth individuals, trusts, and estates (our “clients”) on a fee only basis.

We manage investment assets consistent with our general investment philosophy, which means that most client relationships begin with an evaluation of whether our methodology is consistent with the client’s individual circumstances and objectives. When a client engages us to provide investment advisory services, we shall monitor, on an ongoing basis, the investments in the accounts over which we have investment authority. When engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s). Our investment authority over your account(s) shall continue until our engagement is terminated. We manage portfolios containing individual equity securities, which represent an ownership interest, or the right to acquire an ownership interest, in an issuer. Equity securities also include, among other things, common stocks, preferred securities, convertible stocks and warrants. While we may provide investment advice regarding many different types of investments, our clients’ managed accounts will normally contain a relatively small number of securities positions and may not constitute a fully diversified or balanced portfolio. For example, the portfolios we manage generally do not contain fixed-income investments. While we sometimes manage all of our clients’ assets, we generally manage client accounts without consideration to the other investment assets that we are not managing.

We do not impose a minimum annual fee or minimum asset level for our investment advisory services.

Additional Information: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7, respectively in our [ADV Part 2A](#).

Conversation Starters:

- *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?*

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

We provide our investment advisory services on a fee-only basis. When engaged to provide investment advisory services, we shall charge a fee calculated as a percentage of your assets under our management (our “AUM Fee”). Our annual AUM Fee is generally not negotiable, and ranges from 0.50% to 1.00% of client assets, depending on the dollar amount of assets placed under our management. We typically deduct our AUM fee from one or more of your investment accounts, in advance, on a quarterly basis. Because our fee is based on a percentage of the value of your account, there is an incentive to encourage you to invest more money with us. 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.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). These charges will be assessed in accordance with the qualified custodian’s transaction fee/brokerage commission fee schedule. The qualified custodian may also charge certain administrative fees, including wire transfer fees, account maintenance fees, and account transfer fees. In addition, relative to certain mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g., management fees and other fund expenses).

A copy of our Form ADV Part 2A is available at:

https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=905296

Additional Information: For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [ADV Part 2A](#).

Conversation Starters:

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 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:

* We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.

Additional Information: For more detailed information about our conflicts of interest, please review our [ADV Part 2A](#).

Conversation Starters:

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

How do your financial professionals make money?

Our financial professional is an equity owner of the firm, who stands to receive a share of the firm's profits that can be, but are not necessarily, based on the acquisition of new clients and their growth of assets. This presents a conflict of interest, because it could incentivize our financial professional to recommend that you place additional assets under our management. We mitigate that conflict by always doing what is in the best interest of our clients when making investment recommendations, so that we only make recommendations in conformity with each client's investment objectives and savings strategy. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

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

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Andrew Steginsky, at any time to request a current copy of our [ADV Part 2A](#) or this Form CRS. Our Chief Compliance Officer may be reached by phone at (212) 683-1700.

Conversation Starters:

Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?