

**Part 2A of Form ADV: Firm Brochure**

**Item 1: Cover Page**  
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**July 1, 2015**

This brochure provides information about the qualifications and business practices of 90Capital, LLC. If you have any questions about the contents of this brochure, please contact us at [legal@90capital.com](mailto:legal@90capital.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC” ) or by any state securities authority.

Additional information about 90Capital, LLC is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

SEC registration does not imply a certain level of skill or training.

## **Item 2: Material Changes**

90Capital, LLC is a new SEC registrant as of 2015. There are no material changes to report.

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#### **Item 4: Advisory Business**

90Capital, LLC (“90Capital”, “we”, “us”, “our”, etc.) is an SEC-registered investment adviser that was founded on January 23, 2015. We are solely owned by Kent Costello.

90Capital uses an automated service to buy and sell investments, rebalance portfolios and provide other direct investment services (“Automated Investment Service”, “platform”).

90Capital provides access to an online investment platform designed to assist and guide investors in their long-term investment decisions. After clients fill out a questionnaire covering areas such as their income characteristics, level of risk tolerance, age, and investment time horizon, the platform automatically customizes a diversified investment portfolio based on each specific client’s profile.

Client portfolios are built using exchange-traded funds that follow different market indexes. When building our portfolios, we first select the asset classes to include. Every portfolio has some allocation to equity exchange-traded funds and bond exchange-traded funds. When selecting the exchange-traded funds, we consider expense ratio, index tracking error, fund size, and liquidity.

Clients are able to adjust the portfolio allocations to a desired risk-return profile but are not able to impose restrictions on the underlying investments.

90Capital may also, in any preceding 12-month period, provide advice to fewer than 15 clients through other means, outside its online platform.

#### **Item 5: Fees & Compensation**

90Capital charges a fee of 0.25% for access to the Automated Investment Service.

Additionally, the Automated Investment Service charges a fee of 0.25% of the client’s account value.

All fees will be collected automatically and are prorated across the entire year, charged at the end of each quarter.

As mentioned, 90Capital may also provide advice beyond the Automated Investment Service to fewer than 15 clients in any preceding 12-month period. 90Capital will charge a fee of 0.50% if such services are provided.

The underlying exchange-traded funds charge expense ratio investment fees. These investment fees vary across different exchange-traded funds and will also depend on the portfolio allocation. These expense ratio investment fees can range from 0.05% to 0.70% of the amount invested.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

90Capital does not charge performance-based fees nor enter into side-by-side management arrangements.

## **Item 7: Types of Clients**

90Capital provides its services to individuals seeking assistance building and monitoring an investment portfolio. We do not impose a stated minimum portfolio value for starting and maintaining an investment management relationship.

## **Item 8: Method of Analysis, Investment Strategies and Risk of Loss**

Our investment strategy is to build a diversified portfolio using mix of exchange-traded funds. Clients sign up to the online platform through a portal on our website and complete a questionnaire that assesses their income characteristics, investment time horizon, and risk tolerance. Each client's portfolio allocation will depend on their responses to the questionnaire. Clients with a shorter time horizon and who have less tolerance for volatility in their account balance will be invested using a more conservative approach based on a higher allocation to fixed-income and cash-like investments. Clients with a longer time horizon and who have more tolerance for volatility will have portfolios with a higher allocation to equity investments.

We invest in exchange-traded funds that are subject to the risks of the market. Investing in securities is inherently risky. The value of the funds may raise or fall rapidly, causing the value of each client's investment to fluctuate. Clients should be prepared to bear that risk.

## **Item 9: Disciplinary Information**

Neither 90Capital nor any of its owners or supervised persons have been subject to any legal or disciplinary events which would require disclosure.

## **Item 10: Other Financial Industry Activities and Affiliations**

Kent Costello also is an owner of InHub, LLC, an online platform designed primarily to help institutional investors select investment advisers. InHub, LLC does not provide investment advice and, therefore, does not pose any conflicts of interest.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

90Capital has adopted a Code of Ethics for all employees that addresses topics including Standards of Business, Prohibition Against Insider Trading, Personal Securities Transactions, and Customer Privacy. A copy of this Code will be provided upon request.

## **Item 12: Brokerage Practices**

90Capital considers a range of factors when recommending any broker-dealer to clients. Generally, we seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. Factors we consider include their respective financial strength, reputation, execution, pricing, research and service.

### **Item 13: Review of Accounts**

90Capital monitors client portfolios as part of a continuous and ongoing process. Client accounts are automatically rebalanced to maintain the appropriate asset allocation consistent with their investment goals and objectives.

Clients have access to their accounts through a portal on our website where they can review their portfolio's investment performance at any time and are encouraged to make adjustments to their allocation as needs and goals change.

As stated in Item 4, fewer than 15 clients can choose to work with an investment advisor representative. These clients can schedule phone consultations on an "as needed" basis, up to four per year.

### **Item 14: Client Referrals and Other Compensation**

In the event that a client is seeking the services of an investment advisor representative beyond the capabilities of the Automated Investment Service, 90Capital will offer to make a referral to an outside adviser. If the adviser enters into an investment advisory agreement with the client, the adviser will pay us a solicitation fee of 20% of the contractual fee for as long as the referred party remains a client of the adviser.

### **Item 15: Custody**

90Capital is deemed to have custody over a client's assets when it is authorized to directly debit a client's account for payment of our quarterly advisory fee. In accordance with applicable custody rules, the custodians recommended by 90Capital will make your account statements available for you to review online and will send statements at least quarterly.

### **Item 16: Investment Discretion**

Clients may grant 90Capital the authority to exercise discretion on their behalf. 90Capital is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. 90Capital is given this authority through a power-of-attorney included in the agreement between 90Capital and the client.

### **Item 17: Voting Client Securities**

Because we only recommend exchange-traded funds, we will not vote client securities.

## **Item 18: Financial Information**

90Capital has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.