

## Client Relationship Summary

May 28, 2020

StateTrust Investments, Inc. is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer, and StateTrust Capital, LLC. as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. This Client Relationship Summary provides details about our brokerage and advisory services, fees, and other important information.

Free and simple tools are available for investors to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS). Here, you can also find educational materials about broker-dealers, investment advisers, and investing.

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

StateTrust offers both brokerage and investment advisory services to retail investors. Brokerage services are offered through StateTrust Investments, Inc. and advisory services are offered through StateTrust Capital, LLC.

Depending on your needs and investment objectives, we can provide you with services in a brokerage account, investment advisory account, or both at the same time. This document gives you a summary of the types of services we provide and how you pay.

StateTrust Investments, Inc. (Broker-Dealer)	StateTrust Capital, LLC. (Investment Adviser)
We must act in your best interest and not place our interest ahead of yours when we recommend an investment or an investment strategy involving securities. When we provide any service to you, we must treat you fairly and comply with several specific regulations. Unless we agree otherwise, we are not required to monitor your portfolio or investments on an ongoing basis.	We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis.
You may select investments, or we may recommend investments for your account, but the ultimate investment decision for your investment strategy and the purchase or sale of investments will be yours.	This type of account allows us to buy and sell investments in your account without asking you in advance (a “discretionary account”)
We offer a limited selection of investments. Other firms could offer a wider range of choices, some of which might have lower costs.	Our investment advice will cover a limited selection of investments. Other firms could provide advice on a wider range of choices, some of which might have lower costs.
The minimum amount to open an account is USD \$50,000 and at this level, not all the benefits will be offered or will be available to you (i.e. debit cards, checks, margin, option trading).	The minimum amount to open an account is USD \$100,000. These accounts do not offer debit cards, checks, margin, or option trading regardless of their balance.

**For additional information** about StateTrust Capital, LLC visit the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), about StateTrust Investments, Inc. visit FINRA’s website at <https://brokercheck.finra.org/>, and for more information about StateTrust visit [www.statetrust.com](http://www.statetrust.com)

**Conversation Starters.** Ask your financial professional these questions to learn more:

- *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?***

If you open a brokerage account, you will pay us a transaction-based fee, generally referred to as commission, every time you buy or sell an investment. If you open an advisory account, you will pay an on-going asset-based fee for our services.

Brokerage Account Fees	Advisory Account Fees
<p>The commission you pay is based on the specific transaction and not the value of your account. With stocks or exchange-traded funds, this fee is usually a separate commission. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a “mark-up” or “mark-down”) and it is disclosed separately in the trade confirmation. With mutual funds, this fee (typically called a “load”) reduces the value of your investment.</p>	<p>You will pay an on-going fee at the beginning of each quarter based on the value of the cash and investments in your advisory account. The asset-based fee reduces the value of your account and will be deducted from your account. For some advisory accounts, called wrap fee programs, the asset-based fee will include most transaction costs, and a result are higher typically higher than non-wrap advisory fees.</p>
<p>Our fees vary and are negotiable. The amount you pay will depend, for example, on how much you buy or sell, and what type of investment you buy or sell.</p>	<p>Our fees vary and are negotiable. The amount you pay will depend, for example, on the services and type of program you choose, and the amount of assets in your account.</p>
<p>The more transactions in your account, the more fees we charge you. We therefore have an incentive to encourage you to engage in transactions.</p>	<p>The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account. You pay our fee quarterly even if we do not buy or sell.</p>
<p>From a cost perspective, you may prefer a transaction-based fee if you do not trade often or if you plan to buy and hold investments for longer periods of time.</p>	<p>An asset-based fee may cost more than a transaction-based fee, but you may prefer an asset-based fee if you want continuing advice or want someone to make investment decisions for you.</p>

### 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?*

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.

For additional information, and a full fee schedule for accounts maintained at StateTrust Investments, Inc. visit: <https://www.statetrust.com/disclaimers/>.

Other fees and costs for StateTrust Capital, LLC. are disclosed at account opening and yearly thereafter (unless material changes occur, in which case will be disclosed within 30 days of the material change) on Form ADV Part 2A brochure which can be found at:

<https://www.statetrust.com/wp-content/themes/statetrust/pdf/ADV2A-02-2020.pdf> (specifically Item 5.A. through F.)

### *What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?*

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When we provide you with a recommendation as your broker-dealer or 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 recommendations and investment advice we provide you.

Here is an example to help you understand what this means.

StateTrust Capital, LLC. (“STC”) clients, do not have to authorize StateTrust Investments, Inc. (“STI”) to act as their broker-dealer and can choose a different broker when establishing their account. When STI acts as a broker-dealer for advisory account transactions, STI does not charge a commission or mark-up, although a \$58 order ticket fee (of which \$48 is paid to the investment advisor and \$10 remains with the broker-dealer) is assessed for fixed income transactions. When executing orders in OTC securities on an agency basis, the price of the security may also include the market maker’s mark-up or mark-down. STC recognizes this is a potential conflict of interest as it may present an incentive for STC to route trades as an investment adviser to STC’s affiliated broker-dealer, STI, to generate fee revenues for STI. This fee revenue is separate and apart from STC’s advisory fees.

We generate revenues from our brokerage and investment advisory services as described above.

For additional information, we recommend that you review our Form ADV 2A brochure at: <https://www.statetrust.com/wp-content/themes/statetrust/pdf/ADV2A-02-2020.pdf>, more specifically, Item 12 – Brokerage Practices, which discusses any possible conflict of interests.

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

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The Investment Adviser and/or Broker-Dealer has agreed to pay the Solicitor(s) and/or the Registered Representative a portion of the Advisory Fee and/or commissions, markups, or other costs generated from your account. This portion may range from 20 to 50 percent of the total commissions/fees charged to your account. For Investment Adviser accounts, the quarterly fee is charged as a percentage of the total assets in the account,

### Conversation Starter –

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

the more assets you have, the higher the quarterly fee will be. For Brokerage accounts, the commissions are charged per trade, the more you trade, the higher the commissions you will pay.

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

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-Yes

You can visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and financial professionals.

For additional information, you can also visit FINRA BrokerCheck website at: <https://brokercheck.finra.org/>

### **Conversation Starter –**

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

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For additional information about StateTrust Investments, Inc., StateTrust Capital, LLC. or to request a copy of this relationship summary please visit [www.statetrust.com](http://www.statetrust.com). You may also call 305-921-8101 to request up to date information or a copy of this relationship summary.

### **Conversation Starter –**

- *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?*

To report a problem to the SEC, visit <https://www.sec.gov/complaint/question.shtml> or call the SEC's toll-free investor assistance line at (800) 732-0330. To report a problem to FINRA, visit <https://www.finra.org/investors/have-problem> or call FINRA at (301) 590-6500.