

**Capital Cities Investments**  
**March 20, 2024**  
**FORM CRS**

Capital Cities Investments is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

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

We offer Portfolio Management and Financial Planning Services to our retail investors.

**Account Monitoring:** If you open an investment account with our firm, as part of our standard service we will monitor your investments on a periodic basis.

**Investment Authority:** We manage investment accounts on a discretionary basis whereby **we will decide** which investments to buy or sell for your account. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

**Investment Offerings:** We primarily offer advice on mutual funds and Exchange Traded Funds ("ETFs") however, we may advise you on various types of investments based on your stated goals and objectives or held in your portfolio.

**Account Minimums and Requirements:** In general, we require a minimum account size to open and maintain an advisory account, which may be waived in our discretion.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A by clicking this link: [ADV Part 2](#) (the full URL for the aforementioned hyperlink is: <https://adviserinfo.sec.gov/firm/brochure/116185>).

***Key Questions to Ask Your Financial Professional***

- **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?**

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

- **Asset Based Fees** - Payable quarterly in advance. In limited situations, and at our sole discretion fee arrangements may be modified based on client needs. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets;
- **Hourly and Fixed Fees** - Payable upon completion of service;
- Other common fees and costs applicable to our clients are: custodian fees; account maintenance fees; fees related to variable annuities, including surrender charges; fees related to mutual funds and exchange-traded funds; transaction charges when purchasing or selling securities; and other product-level fees associated with your investments. Clients who use Callan's Unified Managed Account (UMA) program will be charged expenses by the independent managers and other costs for administration of the 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.***

For detailed information, refer to our Form ADV Part 2A by clicking this link [ADV Part 2](#)

***Key Questions to Ask Your Financial Professional***

- **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.

- Certain persons providing advice on behalf of our firm are registered representatives with a broker-dealer. These persons receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- Certain persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs.
- We are affiliated with Capital Cities, LLC through common control and ownership. We will recommend that you use the services of Capital Cities, LLC. if appropriate and suitable for your needs. Our advisory services are separate and distinct from the fees paid to Capital Cities, LLC for their services.

***Key Questions to Ask Your Financial Professional***

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

Refer to our Form ADV Part 2A by clicking this link [ADV Part 2](#) to help you understand what conflicts exist.

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

The financial professionals servicing your account(s) are compensated in the form of salary, bonus, and in certain cases, product sales commissions based on the amount of client assets they service; the products sold (i.e. differential compensation); the revenue the firm earns from the person's services or recommendations. Certain financial professionals are advisory representatives of our affiliated investment adviser and are compensated separately for the services they provide under that investment adviser. The compensation paid to our financial professionals involves a conflict of interest because they have a financial incentive to refer clients to our firm.

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

Yes, our firm or our financial professionals currently have legal or disciplinary history to disclose. These events are disclosed in either our Form ADV or the specific individual's Form U4. These documents can be found by going to [Investor.gov/CRS](http://Investor.gov/CRS).

***Key Questions to Ask Your Financial Professional***

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 317-475-4500 or click the link provided [ADV Part 2](#)

***Key Questions to Ask Your Financial Professional***

- **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?**