



Client Relationship Summary – March 2024

Star Capital Inc. ("Star Capital") is an investment adviser registered with the Minnesota state securities regulators and with a registration pending with the U.S. Securities and Exchange Commission. Investment advisory and brokerage services and fees differ; therefore, 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](https://investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We offer investment management services and investment consulting services to retail investors. As part of our standard management services, we monitor our clients' portfolio holdings and the overall asset allocation strategy on an ongoing basis and will conduct account reviews at least quarterly. Additional reviews may be conducted based on various circumstances, including but not limited to: contributions and withdrawals, year-end tax planning, market moving events, security specific events, and/or changes in the client's risk/return objectives. Investment consulting services may include, but are not limited to, advice on investments, insurance, taxes, retirement needs, and estate planning.

We offer our investment management services on a discretionary or nondiscretionary basis. Discretionary asset management allows us the limited authority to buy and sell investments in your account without asking you each time a transaction is placed. With non-discretionary asset management, we provide investment recommendations but require your approval before placing trades for your account. You make the ultimate decision regarding the purchase or sale of investments. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

We provide investment management recommendations and construct portfolios using a wide array of securities types and may recommend one or more focused or allocation model portfolios developed by Star Capital to meet the investment objectives of clients. In general, non-focused portfolio accounts do not require a minimum dollar amount. We require a cumulative minimum account of \$25,000 for opening or maintaining focused portfolio accounts in our Centaurus model, and a \$50,000 cumulative account minimum for focused portfolio accounts in our Orion/Taurus/Sagittarius/Pisces models.

For additional information, please see our Form ADV Part 2A (with special emphasis on Items 4, 5, 7, and 16) and Form ADV Part 2A, Appendix 1 (Items 4 and 5) which can be found on the SEC website at adviserinfo.sec.gov (CRD #171057).

Conversation Starters – Ask Your Financial Professional:

Given my financial situation, should I choose investment advisory 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?

Principal Fees: We are compensated for providing the investment management services by charging an ongoing asset-based fee that ranges up to 2.00% per annum depending on the type and complexity of the investment management strategy employed, as well as the size of the account or overall client relationship and the portion of fees allocated to the client's assigned Investment Adviser Representative (IAR). The fees are paid quarterly in arrears. With the asset-based fee, the more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account. Star Capital's fees are negotiable depending on individual client circumstances. Investment consulting service fees may be based on a percentage of the assets for which the consulting is provided, up to 1.0% per annum and billable quarterly in arrears; or on a fixed fee basis of up to \$250,000 per project and billed upon completion.

Other Fees and Costs: Star Capital's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. You may incur certain charges imposed by custodians, brokers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on



brokerage accounts and securities transactions. All fees paid to Star Capital for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders, which are disclosed in the funds' prospectuses.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **More detailed information about our fees and costs are included in our Form ADV Part 2A (Item 5).**

Conversation Starter – 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 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 is an example to help you understand what this means.

Investment advisor representatives (IARs) of Star Capital are also licensed and registered as insurance agents to sell various insurance products. Therefore, they will be able to purchase insurance products for clients in need of such services and will receive separate, yet typical commission compensation for the purchase of those products. While the IARs are required as fiduciaries to put the interest of the clients first, the receipt of additional compensation itself creates a conflict of interest. You are under no obligation to purchase insurance products through Star Capital's IARs. **These arrangements and additional information about other conflicts of interest are discussed in more detail in our Form ADV Part 2A.**

Conversation Starter – Ask Your Financial Professional:

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

How do your financial professionals make money?

Our IARs are compensated through the receipt of a portion of revenue we receive for the advisory services we provide. The portion paid to your IAR generally does not vary based on the type of investments that are recommended.

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

Yes. We invite you to visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research our firm and financial professionals.

Conversation Starter – Ask Your Financial Professional:

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

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on [Investor.gov](https://www.investor.gov) or adviserinfo.sec.gov (CRD #171057). Alternatively, you can call us at (651) 444-1116 to speak with us directly to request up-to-date information and request a copy of the relationship summary.

Conversation Starters – 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?