

In On Capital Advisors LLC

CUSTOMER RELATIONSHIP SUMMARY FORM
REGISTERED INVESTMENT ADVISOR (CRD# 290038)
777 Brickell Avenue, Suite 500, Miami, FL 33131

March 28, 2024

This form is intended to provide a summary of the business practices and services provided by In On Capital Advisors LLC. Should you have any questions about the contents of this form please do not hesitate to contact us at (305) 721-2811 or write to compliance@inoncapitaladvisors.com. The information herein has not been approved or verified by the United States Securities and Exchange Commission or by any state authority. The registration as an investment adviser does not imply a certain level of skill or training. Additional information about In On Capital Advisors LLC, is also available on the SEC's website at www.adviserinfo.sec.gov

ITEM 1. INTRODUCTION

In On Capital Advisors LLC is an investment adviser registered with the Securities and Exchange Commission (SEC). We offer discretionary and non-discretionary portfolio management services to our clients and prospective clients. Discretionary accounts provide In On Capital Advisors the authority to make investment decisions on behalf of the client. Non-discretionary accounts, on the other hand, leave the ultimate decision regarding the purchase or sale of investments solely on the client. The adviser's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. As an investment adviser, Firm's principal business is to provide fee-based investment advisory services. It is important for the retail investor to know that the fees paid to us are different from the fees associated with their bank or broker-dealer. In On Capital Advisors will provide investment advisory services and portfolio management services. At no time will In On Capital Advisors accept or maintain custody of a client's funds or securities.

ITEM 2. RELATIONSHIPS AND SERVICES

Q: "What investment services and advise can you provide me?"

At In On Capital Advisors LLC, our team of financial advisors and investment professionals evaluate your investment profile as well as your current investments and determine whether they meet your primary goals of reducing risk and increasing total return on investments. We will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. In some cases, we may modify the portfolio for particular clients based on the client's individual needs, financial objectives and risk tolerance. After formulating pertinent reports from which we establish investment strategies for a portfolio, we then monitor your portfolio's performance on an ongoing basis and will rebalance the portfolio as required by changes in the asset allocation, market conditions and in your financial circumstances. Once this evaluation takes place, we provide the appropriate suggestions and changes we may deem necessary. In On Capital Advisor's cumulative minimum account is \$100,000; however, based on facts and circumstances In On Capital Advisors LLC may, at its sole discretion, accept accounts with a lower value. Please refer to Item 4 of the ADV Brochure Part 2A.

As a retail investor, you may ask us the following questions to start a conversation about relationships and services:

"Given my financial situation, should I choose an investment advisory service? Why or why not?" "How will you choose investment 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

Q: What fees will I pay? Description of others Fees and Costs. Additional Information.

In On Capital Advisors LLC offers advisory services for a fee that is set in and governed by the Advisory Agreement between you, as the Client, and In On Capital, as the Investment Advisor. The Firm's annual fee for investment advisory services provided shall be either a fixed fee or based upon a percentage (%) of the market value of the Assets under management as of the last business day of the previous quarter. This annual *Advisory Fee* shall be prorated and paid quarterly, in advance, in accordance with the fee schedule below. as reported by the financial institutions that act as brokers and/or custodians for the client (i.e. advisory fees for first quarter are paid in April).

The fees charged to each client are a function of the type and size of the client's portfolio. These fees range from .75% to 1.50% per annum. These fees may be negotiated by the advisor under unusual circumstances, at the sole discretion of the advisor. The percentage fee schedule is based on the net asset value of the portfolio as follows: For account up to \$1,000,000, the advisory fee is 1.50%; for accounts that range from \$1,000,001 to \$5,000,000, the advisory fee is 1.00% and, finally, for accounts over \$5,000,001 the advisory fee is .75%. Asset management fees will be invoiced and deducted from the client's account on a quarterly basis by the broker-dealer where you have your account. If you have a net worth greater than \$2,100,000, you may qualify, and elect to pay, a fee based on the capital gains in your account(s), known as a "Performance Fee". Ask us about the requirements, terms and conditions applicable to Performance-based advisory fees. Clients that are paying a performance-based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes. All fees paid to the Firm for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the sponsor also imposes sales charges, a client may pay an initial or deferred sale or surrender charge. A client could invest in these products directly,

without the services of the Firm. In that case, the client would not receive the services provided by the Firm which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the product sponsor and the fees charged by the Firm to fully understand the total fees to be paid. It is important to note that 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.

As a retail investor, you may ask a financial professional the following questions to start a conversation about the impact of fees and costs to your investments:

“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 advisor? 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 interests 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. One example is that the more assets there are in the account, the more fees the retail client will pay in fees thereby creating an incentive to encourage the retail investor to increase the assets in the account. Employees of In On Capital Advisors and their family members are permitted to have accounts (“Employee Accounts”) that may invest in the same securities that are recommended to clients. Such a practice, including if Employee accounts were managed by In On Capital Advisors, would present inherent conflicts of interest, such as employees: 1) trading before clients (i.e., front-running), and/or 2) receiving a better allocation or price than clients. To address and mitigate potential conflicts of interests associated with personal trading, should they arise in the future, In On Capital Advisors has developed written policies and procedures to help ensure that Employee Accounts are not favored over other clients’ accounts. In addition, employees should not purchase or sell individual securities held in In On’s investment strategy unless it is through an Employee Account managed by In On Capital Advisors, or in limited circumstances, if the transaction is pre-cleared by the CCO.

As a retail investor, you may ask a financial professional the following questions to start a conversation about the Conflicts of Interest: How might your conflicts of interest affect me, and how will you address them?

The CCO monitors employee trading, relative to client trading, to ensure that employees do not engage in improper transactions. We will notify you in case additional conflicts ever arise.

Q. How do your financial professionals make money?

In On Capital Advisors LLC compensation for investment professionals is based on individual arrangements with each employee. Our Advisors may receive a fixed salary, a variable compensation based on the advisory fees charged to clients or a combination of both.

ITEM 4. DISCIPLINARY HISTORY

Q. Do your financial professionals have legal or disciplinary history? **No**

Neither In On Capital Advisors LLC nor any employee of the firm has been subject to any disciplinary actions by the securities Exchange Commission (SEC) or any other regulatory authority. Here are available free and simple tools you may utilize to inform yourself further and research our firm and/or our financial advisors. You may do so at Investor.gov/CRS, which also provides educational material about broker-dealers, investment advisers and investing.

As a retail investor, you may ask a financial professional the following questions to start a conversation about the financial professional’s disciplinary history:

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

ITEM 5. ADDITIONAL INFORMATION

You can find additional information about your investment advisory services and request a copy of the relationship summary by contacting us at (305) 721-2811 or at compliance@inoncapitaladvisors.com. You can also find additional information about In On Capital Advisors LLC on the SEC’s website at www.adviserinfo.sec.gov.

As a retail investor, you may ask a financial professional the following question to start a conversation about contacts and complaints: “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?”
