

Client Relationship Summary

Network Capital LLC (“Network Capital”) is an investment adviser registered with the Securities and Exchange Commission (SEC) under the Internet Adviser Exemption. We are not a broker-dealer. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We provide automated, algorithm-driven portfolio management and financial planning services exclusively through our online platform (the “Platform”). We do not provide advisory services by telephone or in person. Your account has two components: a **Managed Sleeve**, where our algorithms invest on your behalf with full discretionary authority—selecting, buying, selling, and rebalancing securities without asking you in advance—and a **Self-Directed Sleeve**, where you make your own individual trading decisions. The Platform monitors your entire account for risk and concentration.

Monitoring: We continuously and automatically monitor your portfolio across both sleeves as a standard part of our service.

Limited Investments: We invest primarily in U.S.-listed equities, ETFs, and fixed income securities held at qualified U.S. custodians.

Account Minimums: \$100,000 for individuals; \$250,000 for institutional clients. We may waive these minimums at our discretion.

For more detailed information, see our [Form ADV Part 2A brochure](#) (Items 4 and 7) at adviserinfo.sec.gov.

Conversation Starters:

▶ 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?

Our principal fee is an ongoing asset-based management fee, charged quarterly in arrears as a percentage of your total account value (both sleeves). The more assets in your account, the more you will pay in fees, so we have an incentive to encourage you to increase the assets in your account.

Assets Under Management	Annual Fee
First \$1,000,000	1.25%
\$1,000,001 – \$5,000,000	1.00%
\$5,000,001 – \$25,000,000	0.75%
Over \$25,000,000	Negotiable

Other costs you will pay: custodian fees, brokerage commissions on self-directed trades, wire transfer fees, foreign exchange fees (for non-U.S. clients), account facilitation fees, and internal expenses of any ETFs or funds in which your account invests. These costs reduce your investment returns.

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 more detail, see our [Form ADV Part 2A brochure](#) (Item 5) at adviserinfo.sec.gov.

Conversation Starters:

▶ 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:

Affiliated Entities: We are under common ownership with The Network Labs Ltd. Co. (a foreign brokerage), The Network Bank Ltd. Co. (a foreign bank), and Network Clearing LLC (a U.S. money services business). These affiliates may introduce clients to us, and we may have an incentive to favor affiliated services.

Referral Compensation: We may pay affiliated or unaffiliated persons for client referrals. This does not increase your fees.

For more detail, see our [Form ADV Part 2A brochure](#) (Items 10 and 11) at adviserinfo.sec.gov.

Conversation Starters:

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

How do your financial professionals make money?

Our sole financial professional, Nicholas Klein, is compensated through his ownership interest in the Firm and its affiliated entities. He does not receive transaction-based commissions or sales incentives tied to specific products.

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

No. Neither the Firm nor its financial professionals have reportable legal or disciplinary history. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Conversation Starters:

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

Additional Information

For additional information about our services, visit networkcap.us or see our filings at adviserinfo.sec.gov. To request a copy of this relationship summary or for up-to-date information, contact us at **(415) 734-1666** or support@networkcap.us.

Conversation Starters:

▶ *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?*