

### Form CRS – Client Relationship Summary

June 24, 2020

#### Introduction

**Disciplina Capital Management, LLC** is registered with the US Securities and Exchange Commission as an Investment Adviser. You have a choice among different types of financial services professionals to assist you with your financial needs. 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 <a href="https://www.investor.gov/CRS">www.investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.

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

We no longer offer investment advisory services to individual investors. However, we have a limited number of individual investors who have legacy arrangements with us to manage their portfolios. Our primary service offering, *Outsourced Chief Investment Officer ("OCIO") Services*, is exclusively geared to institutional investors.

Legacy clients who are individual investors are provided portfolio management services. If you have invested with us, we have developed an investment plan designed to meet your investment objectives and provide ongoing management of your assets. As part of our standard services, we continuously monitor your investments and provided a formal review of your portfolio on a monthly basis. We primarily invest client portfolios in exchange traded funds, private funds, other alternatives, mutual funds and third-party money managers. We do not recommend any proprietary products. The minimum investment portfolio is generally set at \$25,000,000. We may negotiate our minimum portfolio or minimum fees when we deem it appropriate to the circumstances.

We manage your investment portfolio on a discretionary basis. Under a discretionary arrangement, we have the authority to buy and sell securities in your account(s) without asking you in advance. You sign an advisory agreement giving us this authority until either you or we terminate that agreement. Reasonable limitations may be placed on our authority, subject to our approval.

More detailed information on our services is available in our Form ADV Part 2A (our "Brochure") in Items 4, 7, 13, and 16. We are here to help you and encourage you to ask us questions. For example, you might want to ask us:

- 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 portfolio management fees are calculated as a percentage of the assets we manage for you, and are billed monthly in arrears. Our minimum annual fee is \$135,000 based upon a \$25,000,000 account.

In addition to the fees that we charge, your portfolio will incur other expenses. The most common examples are brokerage transaction fees (such as the fee that the broker charges to buy or sell a security in your account), custodian fees, and fees imposed by mutual funds and exchange traded funds. If all or a portion of your assets is managed by a third-party money manager, you will also pay the manager's advisory fee, which will be separate and additional to our fees. If your assets are invested in a Private Fund, the fees and expenses assessed by the Private Fund will also be separate from and in addition to our fee.

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.

More information about our fees is available in our Form ADV Part 2A (our "Brochure") in Items 5 and 12. We are happy to address fee arrangements in more detail with you. For example, you might want to ask:

• 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 to you. Here are some examples to help you understand what this means.

We charge an investment advisory fee based on the assets we manage for you. We believe this fee structure aligns our interests with yours, since we earn more fees as the value of your portfolio increases. Nonetheless, this type of fee arrangement could also influence us to recommend that you deposit more assets in your account, which would increase our fees.

As a registered investment adviser, we are held to what is known as a fiduciary standard, which covers our entire investment advisory relationship with you. The standard requires our constant commitment to our duty of loyalty and care to you, our client. As a fiduciary, we must eliminate any conflicts of interest or tell you about them in a way you can understand, so that you can decide whether to agree to them.

More information is available in our Form ADV Part 2A (our "Brochure") in Items 11 and 12. Please ask us:

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

## How do your financial professionals make money?

Financial professionals who are owners of the firm receive their share of corporate distributions based on firm profits. The receipt of compensation based on revenue or profits could influence us to recommend that you increase the assets that we manage. None of our financial professionals earn any type of commission (e.g., product sales commissions or revenue from securities bought or sold).

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

No. We encourage you to visit <a href="www.Investor.gov/CRS">www.Investor.gov/CRS</a> for a free and simple search tool to research us and our financial professionals. You might want to ask us:

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

## Additional information

Please refer to our Brochure for more details on our investment advisory services and other topics. Please call us at (615) 490-6007 or email <a href="mailto:mww@disciplina.com">mww@disciplina.com</a> to request up-to-date information and a copy of the Client Relationship Summary and/or Brochure. We encourage you to ask:

• 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?