

Antonetti Capital Management, LLC
Customer Relationship Summary
June 2020

Item 1. Introduction

Antonetti Capital Management, LLC (“Antonetti Capital”) is an investment adviser registered 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://www.investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

Item 2. Relationships and Services

“What investment services and advice can you provide me?”

Description of Services and Monitoring

We provide investment advisory services to retail investors, including asset management and financial planning. For clients to whom we provide asset management services, we offer separately managed accounts which we monitor on an ongoing basis and rebalance as required by changes in market conditions and in line with your financial circumstances. As part of our standard services, your Investment Adviser Representative (“IAR”) will monitor your accounts on an on-going basis and will conduct internal account reviews at least annually to ensure the advisory services provided to you and the portfolio mix are consistent with your stated investment needs and objectives. 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 your risk/return objectives. Our financial planning services are typically included in our asset management services. Should we create a stand-alone plan, reviews would be conducted on an “as needed” basis.

Investment Authority

We offer our asset management accounts on both a **discretionary** and **non-discretionary** basis. Discretionary asset management allows us the limited authority to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. With non-discretionary asset management, we provide investment recommendations but require your approval to proceed. 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.

Investment Offerings and Minimum Requirements

While we can advise on any investment asset, our investment recommendations are primarily related to investments in Exchange Traded Funds (“ETFs”), mutual funds, equity securities, corporate debt securities, commercial paper, municipal securities, U.S. Government securities and options. As a condition for starting and maintaining a relationship, we generally require a minimum of \$100,000 which we may waive at our discretion.

Additional Information

For additional information, please see our [Form ADV Part 2A](#) (with special emphasis on Items 4, 7, and 16).

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?

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

“What fees will I pay?”

Our fees are based on the type(s) of service(s) we provide.

- **Discretionary Asset Management:** We charge an ongoing asset-based fee quarterly. The fee is charged in advance at the beginning of the quarter, and is computed as a percentage of the market value of your account at the end of the previous quarter. The more assets in your advisory account, the more you will pay in fees. We may, therefore, have an incentive to encourage you to increase the assets in your account.
- **Non-Discretionary Asset Management:** For non-discretionary asset management services, we charge a quarterly fixed fee. The fee is charged in advance and may be waived at our discretion.
- **Financial Planning:** We provide limited financial planning services at no additional charge to clients who have retained us for portfolio management services. For more extensive financial planning services, we charge an hourly or fixed fee. The fee and the fee paying arrangements are negotiable and will be determined on a case-by-case basis.

* Consider asking your financial professional these questions.

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Other Fees and Costs: Some investments, such as mutual funds and exchange traded funds, impose additional fees that may reduce the value of your investments over time. Those fees may include mutual fund expenses and sales charges. You may also pay other fees to the custodian of your assets. These include, but may not be limited to, commissions, ticket charges on transactions, fees for wire transfers, stop payments, account maintenance, duplicate check or statement copies, overnight deliveries, returned checks, and asset transfers.

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](#) (Items 5.A., B., C., and D.)

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?”

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.

For example, we receive an economic benefit from your custodian in the form of the support products and services it makes available to us and other independent investment advisers whose clients maintain their accounts at your custodian. The receipt of such economic benefits by us or our IARs in and of itself creates a potential conflict of interest and may indirectly influence our choice of a particular custodian for custody and brokerage services. To address these potential conflicts of interest, we have developed and implemented a Compliance Program, which includes a review of the services and execution quality we receive from the custodians we recommend. These arrangements and additional information about other conflicts of interest are discussed in more detail in our [Form ADV Part 2A](#).

“How else does your firm make money and what conflicts of interest do you have?”

We only generate revenues from our asset management and financial planning services as described above.

Conversation Starter *

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

“How do your financial professionals make money?”

Our financial professionals are compensated through salaries and/or a portion of revenue we receive for the advisory services we provide. The portion paid to your financial professional generally does not vary based on the type of investments that are recommended. Additionally, as an independently owned investment adviser, our owner receives compensation based on the revenues generated by our firm for its advisory services.

Item 4. Disciplinary History

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

Yes – One of our IARs has reportable disclosure items. We invite you to visit Investor.gov/CRS for a free and simple search tool to research our Firm and financial professionals.

Conversation Starters *

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

Item 5. Additional Information

We encourage you to seek out additional information about our investment advisory services in our [Form ADV Brochure](#) on Investor.gov or adviserinfo.sec.gov. Alternatively, you can call Antonetti Capital toll-free at (239) 403-0218 to speak with us directly.

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?

* Consider asking your financial professional these questions.