

Hart Capital Management, Inc.

Form ADV Part 3 - Client Relationship Summary

Date: 06/03/2020

Item 1: Introduction

HART CAPITAL MANAGEMENT, INC. is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions 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 investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: portfolio management (we review your portfolio, investment strategy, and investments); financial planning (we assess your financial situation and provide advice to meet your goals). As part of our standard services, we typically monitor client accounts on a continual basis. Our firm offers both discretionary advisory services (where our firm makes the decision regarding the purchase or sale of investments) as well as non-discretionary services (which are primarily institutional retirement plans, where individuals in the plan make the ultimate decision). We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. Our minimum account size is \$250,000. Please also see our Form ADV Part 2A ("[Brochure](#)"), specifically Items 4 & 7.

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

Questions to ask us: 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? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? Our fees vary depending on the services you receive. Additionally, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. Our fixed fee arrangements are based on the amount of work we expect to perform for you, so material changes in that amount of work will affect the advisory fee we quote you. **You will pay fees whether you make or lose money on investments, and those fees will reduce any amount of money you make on investments over time. Please make sure you understand what fees and costs you are paying.** Please also see our [Brochure](#) for additional details.

For our clients, the fees are generally charged quarterly, in advance, unless the contract specifically states something different. All fees are charged as a percentage of the net market value of the account at the beginning of the quarter. If we provide certain investment and consulting services to Group Retirement Plans, fees are charged quarterly in either arrears or advance (depending on the contract).

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In general, they are charged a percentage on the net market value of the account at the time of billing, but that may depend on the contractual terms. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected.

For our financial planning services, we may charge a fee of \$600 - \$10,000, depending on the scope of the specific financial plan. Importantly, we will waive the fee for those who become clients with ongoing discretionary accounts. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#).

Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. Additionally, you may pay transaction fees, if applicable, when we buy or sell an investment for your account.

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** (see heading immediately below).

How do your financial professionals make money? Primarily, we and our financial professionals receive advisory fees from you for the advisory services we provide. This compensation may vary based on different factors, such as those listed above in this Item.

Item 4: Disciplinary History

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Do you or your financial professionals have legal or disciplinary history? We do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: 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?

For additional information on our advisory services, see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/112108> and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 509-444-7007.

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Exhibit A - Material Changes to Client Relationship Summary

This is the initial version of the Client Relationship Summary. There are no material changes.