

## Romen Capital Client Relationship Summary – June 2024

Romen Capital Management, LLC (“Romen 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.

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

We offer investment management services to retail and other investors. As part of our standard services, we monitor our clients’ portfolio holdings and the overall asset allocation strategy on an ongoing basis.

We offer our asset management services on a discretionary basis. Discretionary asset management allows us the limited authority to buy and sell investments in your account without asking your approval each time a transaction is placed. Our level of authority is determined at the beginning of our relationship with you, but can be changed upon request.

While we can advise on any investment asset, our investment recommendations are primarily related to investments in exchange traded and over the counter equity securities (stocks) and options on securities. We do not have any minimum initial requirements for opening accounts for retail investors. However, we require that all of our clients meet the definition of Qualified Clients (by either investing \$1.1 million through Romen Capital, or having a net worth of at least \$2.2 million).

**For additional information, please see our Form ADV Part 2A (with special emphasis on Items 4, 7, and 16) which can be obtained by calling us at 917-613-2887.**

#### ***Conversation Starters – Ask Your Financial Professional:***

Given my financial situation, should I choose investment advisory services? 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?*

**Principal Fees:** We are compensated for providing the investment management services by charging a performance fee of 20% of profits in the client account for the calendar year. At the end of the year, the fee is calculated and deducted from the client’s account in January of the following year. The fee is negotiable at our sole discretion. A conflict of interest concerning accounts with performance-based fees is that the advisor is incented to use higher risk investments than called for by the client risk profile. Such investments may generate higher returns, which in turn would generate higher performance-based fees for the advisor.

**Other Fees and Costs:** Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor’s performance fee is separate and distinct from the custodian and execution fees.

**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 (Item 5).**

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### **Conversation Starter – Ask Your Financial Professional:**

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 is an example to help you understand what this means.

Romen Capital and its Investment Advisor Representatives (IARs) are allowed to invest for their own accounts in the same securities that we recommend or acquire for your account, and may engage in transactions that are the same or different than transactions recommended or made for you. This creates a conflict of interest that we mitigate by maintaining a Code of Ethics and compliance program that sets forth a standard of conduct that must be adhered to by all Romen Capital personnel. In addition, the firm and its personnel are fiduciaries by law and are required to put the interests of client first. **These arrangements and additional information about other conflicts of interest are discussed in more detail in our Form ADV Part 2A.**

### **Conversation Starter – Ask Your Financial Professional:**

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

*How do your financial professionals make money?*

Our IARs are compensated through the receipt of a portion of revenue we receive for the advisory services we provide. The portion paid to your IAR generally does not vary based on the type of investments that are recommended.

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

No. We invite you to visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research our Firm and financial professionals.

### **Conversation Starter – Ask Your Financial Professional:**

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

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on [Investor.gov](https://www.investor.gov) or [adviserinfo.sec.gov](https://adviserinfo.sec.gov) (CRD# 331724). Alternatively, you can call us at 917-613-2887 to speak with us directly to request up-to-date information and request a copy of the relationship summary.

### **Conversation Starters – Ask Your Financial Professional:**

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?