

**Truvestments Capital LLC**  
**June 10, 2020**  
**FORM CRS**

Truvestments Capital LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

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

We offer the following investment advisory services to retail investors: Portfolio Management Services, Financial Planning Services, Selection of Other Advisers, Pension Consulting Services, Sub-Advisory Services, Family Office and Wealth Planning Services, Pension Consulting Services, and Sponsor and Manager of a Wrap Fee Program. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 and Form ADV Part 2 Appendix 1 Brochures Items 4 and 5 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/291297>.

- **Account Monitoring** - If you open an investment account with our firm, we will monitor your investments on a daily basis and will conduct account reviews at least annually.
- **Investment Authority** - We manage investment accounts on a discretionary basis whereby we will decide which investments to buy or sell for your account. We have discretion to select, retain or replace third-party managers to manage your accounts. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. We also offer non-discretionary investment management services whereby we will provide advice, but you will ultimately decide which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.
- **Investment Offerings** - We offer advice on the following types of investments or products: equity securities, warrants, corporate debt securities (other than commercial paper), commercial paper, municipal securities, variable life insurance, variable annuities, mutual fund shares, United States government securities, options contracts on securities, money market funds, real estate, REITs, PIPEs, derivatives, structured notes, ETFs, interests in partnerships investing in real estate and interests in partnerships investing in oil and gas interests.
- **Account Minimums and Requirements** - In general, we do not require a minimum dollar amount to open and maintain an advisory account.

**Key Questions to Ask Your Financial Professional**

- **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?**

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 and Form ADV Part 2 Appendix 1 Brochures by clicking this link <https://adviserinfo.sec.gov/firm/brochure/291297>.

- **Asset Based Fees, including Sub-Advisory Fees** - Payable quarterly in advance based on the last value of your account on the last day of the previous quarter. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets;
- **Hourly Fees** - Payable in arrears;
- **Fixed Fees** - Payable 50% in advance and 50% upon completion of services rendered;
- **Wrap Program Fees** - Payable quarterly in advance, based on the balance at end of billing period. Asset-based fees associated with a wrap fee program generally include most transaction costs and fees to a broker-dealer or bank that has custody of the assets; therefore, the asset-based fee is higher than a typical asset-based advisory fee. Since our firm pays the transaction costs associated with securities transactions in your account, we have an incentive to minimize the trading in your account;
- **Other Advisory Fees** - In addition to our fees, we are also compensated by: Advisory fees charged by third party money managers, which are separate and apart from our fees.

Examples of the most common fees and costs applicable to our clients are: custodian fees, fees related to margin, account maintenance fees, fees related to mutual funds and exchange-traded funds, transaction charges when purchasing or selling securities, and other product-level fees associated with your investments.

**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.**

**Key Questions to 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 are some examples to help you understand what this means.

- **Proprietary Trading** - We recommend investments that are issued, sponsored, or managed by our firm or our affiliates. We have a financial incentive to recommend such proprietary investments;
- **Third-Party Payments** - Persons providing advice on behalf of our firm are registered representatives with a broker-dealer, APW Capital Inc. These persons receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- **Third-Party Payments** -Persons providing advice on behalf of our firm are investment adviser representatives with another registered investment adviser, The McEnerney Group and East Coast Tax and Financial Planning. These persons receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- **Third-Party Payments** -Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs.
- **Affiliations** - We are affiliated with several entities: Elite Wealth Advisors, LLC, Truvestments Asset Management, LLC, Siriyanfah Williams Holdings, LLC, Elite Wealth Advisors LLC, Demogronomics LLC. We will recommend that you use the services of our affiliates, if suitable, and can receive compensation in this capacity. Our advisory services are separate and distinct from the fees paid to our affiliates for their services.

Refer to our Form ADV Part 2A and Form ADV Part 2 Appendix 1 Brochures by clicking this link <https://adviserinfo.sec.gov/firm/brochure/291297> to help you understand what conflicts exist.

**Key Questions to 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?**

The financial professionals servicing your account(s) are compensated with a salary.

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

Yes, our firm or our financial professionals currently have legal or disciplinary history to disclose. These events are disclosed in either our Form ADV or the specific individual's Form U4. These documents can be found by going to [Investor.gov/CRS](http://Investor.gov/CRS) and <https://brokercheck.finra.org/>.

**Key Questions to Ask Your Financial Professional**

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 941-753-3814 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/291297>.

**Key Questions to 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?**