

Item 1 – Introduction

Steginsky Capital LLC (“we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as a Registered Investment Adviser (“RIA”). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, and 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. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 – Relationships and Services

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary investment advisory services to individuals, high net worth individuals, trusts, and estates (our “clients”) on a fee only basis.

We manage investment assets consistent with our general investment philosophy, which means that most client relationships begin with an evaluation of whether our methodology is consistent with the client’s individual circumstances and objectives. When a client engages us to provide investment advisory services, we shall monitor, on an ongoing basis, the investments in the accounts over which we have investment authority. When engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s). Our investment authority over your account(s) shall continue until our engagement is terminated. We manage portfolios containing individual equity securities, which represent an ownership interest, or the right to acquire an ownership interest, in an issuer. Equity securities also include, among other things, common stocks, preferred securities, convertible stocks and warrants. While we may provide investment advice regarding many different types of investments, our clients’ managed accounts will normally contain a relatively small number of securities positions and may not constitute a fully diversified or balanced portfolio. For example, the portfolios we manage generally do not contain fixed-income investments. While we sometimes manage all of our clients’ assets, we generally manage client accounts without consideration to the other investment assets that we are not managing.

We do not impose a minimum annual fee or minimum asset level for our investment advisory services.

Additional Information: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7, respectively in our [ADV Part 2A](#).

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?

We provide our investment advisory services on a fee-only basis. When engaged to provide investment advisory services, we shall charge a fee calculated as a percentage of your assets under our management (our “AUM Fee”). Our annual AUM Fee is generally not negotiable, and ranges from 0.50% to 1.00% of client assets, depending on the dollar amount of assets placed under our management. We typically deduct our AUM fee from one or more of your investment accounts, in advance, on a quarterly basis. Because our fee is based on a percentage of the value of your account, there is an incentive to encourage you to invest more money with us. 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.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). These charges will be assessed in accordance with the qualified custodian’s transaction fee/brokerage commission fee schedule. The qualified custodian may also charge certain administrative fees, including wire transfer fees, account maintenance fees, and account transfer fees. In addition, relative to certain mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g., management fees and other fund expenses).

A copy of our Form ADV Part 2A is available at:

https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=905296

Additional Information: For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our [ADV Part 2A](#).

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? 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:

* We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.

Additional Information: For more detailed information about our conflicts of interest, please review our [ADV Part 2A](#).

Conversation Starters:

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

How do your financial professionals make money?

Our financial professional is an equity owner of the firm, who stands to receive a share of the firm's profits that can be, but are not necessarily, based on the acquisition of new clients and their growth of assets. This presents a conflict of interest, because it could incentivize our financial professional to recommend that you place additional assets under our management. We mitigate that conflict by always doing what is in the best interest of our clients when making investment recommendations, so that we only make recommendations in conformity with each client's investment objectives and savings strategy. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

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

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer, Andrew Steginsky, at any time to request a current copy of our [ADV Part 2A](#) or this Form CRS. Our Chief Compliance Officer may be reached by phone at (212) 683-1700.

Conversation Starters:

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?

Item 1 Cover Page

A.

Andrew D. Steginsky

Steginsky Capital LLC

ADV Part 2B, Brochure Supplement
Dated: March 29, 2024

Contact: Andrew Steginsky, Chief Compliance Officer
60 Madison Ave, Suite 1026
New York, New York 10010

B.

This Brochure Supplement provides information about Andrew D. Steginsky that supplements the Steginsky Capital LLC Brochure; you should have received a copy of that Brochure. Please contact Andrew Steginsky, Chief Compliance Officer, if you did *not* receive Steginsky Capital LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Andrew D. Steginsky is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Andrew D. Steginsky was born in 1957. Mr. Steginsky graduated from Ohio State University in 1981, with a degree in Finance/Economics. He has been employed as Manager and Founder of Steginsky Capital LLC since March 2000.

Mr. Steginsky has been a CFA[®] Charterholder since 1999. CFA[®] designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA[®] Charterholders working in over 170 countries and regions. To earn the CFA[®] charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA[®] Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA[®] charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA[®] Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA[®] charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 Disciplinary Information

There are no legal or disciplinary events to disclose.

Item 4 Other Business Activities

- A. Mr. Steginsky is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Steginsky is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

As a Member of the Registrant, Mr. Steginsky's compensation is based, in part, on the amount of assets under the Registrant's management. Accordingly, Mr. Steginsky has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures manual is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Andrew Steginsky, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Steginsky is available at (212) 683-1700.