



Form CRS

SOL CAPITAL MANAGEMENT COMPANY

SOL Capital Management Company (“we”, “our”, or “us”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differs from that of a registered broker-dealer. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing. Information in text boxes below are intended to be conversation starters for you to have with us and are required by the instructions to Form CRS.

What investment services and advice can you provide me?

We provide discretionary and non-discretionary investment management and consulting services to retail investors, which include individuals and their trusts and estates.

We first determine your investment objective and risk tolerances, draft an appropriate investment policy statement, and then invest or recommend that you invest your assets according to your investment objectives. Once invested, we monitor and review your account performance and asset allocation and may rebalance or recommend that you rebalance as necessary based on these reviews.

When we provide our services on a discretionary basis, it means we have the authority to buy and sell investments in your account without speaking to you prior to doing so. When we have a non-discretionary relationship, we monitor and review an account and at times make securities recommendations to the client, but it is up to the client to decide whether to accept or reject our recommendations and if the client accepts our recommendations, we will place the trades with the custodian and ensure settlement of those trades. In these cases, we can also monitor and report on these accounts to the client.

You can place reasonable restrictions on the securities and types of securities that we buy by notifying us, in writing. We offer advice on limited types of securities, but they include exchange-listed securities, over the counter securities, exchange-traded funds, mutual funds, and other alternative investments. Our Form ADV Part 2A contains a more detailed list. We generally require our clients have a minimum net worth of \$5,000,000 although we may make exceptions. 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 Form ADV Part 2A.

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?

Our fee is tiered and based on a percentage of your assets under our management. Our fee generally begins at 1.00% annually and is reduced based on the amount of asset you place under our management. We generally deduct our fee from one or more of your investment accounts on a monthly basis, in arrears. The fee is calculated based upon the average daily balance of the total gross market value of the assets held in your account, without deducting any margin balance, for the previous month.

Because our fee is based on the amount of your assets under our management, the more assets you entrust us to manage, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you entrust to us.

Your account will be held with a qualified custodian. Custodians may charge transaction fees for effecting certain securities transactions. In addition, your assets can be invested in mutual funds and ETFs. You will bear your pro rata share of the investment management fees and other fees of these investments, which are in addition to the fees you pay us. These fees and expenses are described in each fund’s prospectus and potentially include a management fee, distribution fee, and other fund expenses. 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.



Help me understand how these fees and costs might affect my investments. If I give you \$5,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?

For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our Form ADV Part 2A.

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, there are always some potential 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 non-monetary support services. This presents a conflict of interest, because our receipt of their support makes us more inclined to continue using and recommending them.

We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we don't currently manage your account held with your employer's plan, this will increase our compensation.

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

For more detailed information about our conflicts of interest, please review Items 4, 5, 11 and 12 of our Form ADV Part 2A.

How do your financial professionals make money?

Our financial professionals are generally compensated on a salary basis and may receive bonuses. Bonuses are based on two primary factors—our overall revenue and individual performance. Certain other employees stand to receive bonuses that are directly attributable to introduction of clients to us and the revenues generated by those clients. In addition, certain of our financial professionals are equity owners of the firm, in which case they stand to receive a share of the profits of the firm.

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?

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at any time to request a current copy of your Form ADV Part 2A or our relationship summary. Our Chief Compliance Officer may be reached by phone at (301) 881-3727.

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?
