

Introduction

We are Podesta & Co. ("Podesta"), a FINRA-registered broker-dealer. Brokerage services and fees differ, 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](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals' registration information are also publicly available on the [Investor.gov](https://www.investor.gov) website.

Relationships & Services

Q: What investment services and advice can you provide me?

A: We offer brokerage services to retail clients and to a variety of corporate and legal entities such as trusts, IRAs, partnerships, and small companies. Through our clearing firm we assist you in opening the right type of account for your needs, assist in transmitting signed paperwork to our clearing firm, and assist with money movement activity and related requests (i.e., requesting checks drawn on your account, transmitting wires, establishing ACH privileges).

We offer advice on a full suite of securities, including equities, fixed income, options, real estate investment trusts ("REITs"), structured notes, and private placements.

We are incentivized to utilize mutual funds that carry 12b-1 fees, as this represents additional compensation to us. You do not pay transaction costs but receive an overall net return that is lower by the amount of the 12b-1 fee.

Q: Given my financial situation, should I choose a brokerage service? Why or why not?

A: Our investment advice is for those investors who do not require continuous portfolio supervision. Our recommendations are based upon your financial circumstances, income, net worth, investable assets, investment objectives, and tolerance for risk. Our business is transaction oriented and our compensation is the commission we earn on each transaction. As a result, we are economically incentivized to effect a higher number of transactions for you.

Q: How will you choose investments to recommend to me?

A: We choose investments that are in your best interest given your investment preferences, financial circumstances, income, net worth, investable assets, investment objectives, and tolerance for risk. Generally, we do not provide ongoing portfolio monitoring, but we do monitor options positions, as they require periodic rolling over to a new expiration month, or the options get assigned and we must take further actions.

Q: What is your relevant experience, including your licenses, education, and other qualifications?

A: Our financial professionals have been in the financial services industry for several years and maintain the Series 7 and Series 63 exam qualifications. Certain supervisory professionals also maintain applicable FINRA supervisory licenses, such as the Series 24, 27, or 28 exam qualification. You can find information on any professional designations of your financial professional by accessing [FINRA.org](https://www.finra.org) and utilizing the BrokerCheck functionality.

Q: What do these qualifications mean?

A: These qualifications assure that our professionals have met specific regulatory exam requirements and continuing education requirements to conduct securities activities.

Fees, Costs, Conflicts & Standard of Conduct

Q: What fees will I pay?

A: Our fees for securities transactions are commission based so that we only generate revenue when you effect a securities transaction. Commissions may vary depending on the type of security and the amount and price of the security. In addition to paying commissions, there are separate charges for establishing and maintaining IRA accounts. If you trade on margin, we earn a portion of the margin interest charged your account. If you keep uninvested cash in your account, we earn a portion of the interest that is credited to your account (interest on free credit balance). In addition, there are postage and handling fees, SEC fees, transfer tax fees, and similar fees on a per transaction basis. Also, you may be assessed inactivity fees should your account be dormant for some period of time.

Q: Help me understand how these fees and costs might affect my investments. If I give you \$100,000 to invest, how much will go to fees and costs, and how much will be invested for me?

A: Commissions are added to your purchase transactions or subtracted from your sales proceeds on a per transaction basis. This results in an economic incentive to have you trade more frequently. The more you trade, the higher your costs, which will adversely impact your gains or losses, as applicable. In addition, certain types of securities transactions such as private placements, REITs, and other illiquid securities generally carry a much higher commission cost than publicly traded securities. In addition, you should be mindful of minimum commission amounts on a per trade basis.

Trades for low dollar amounts could cause you to pay an excessive amount of commission relative to the total cost of the securities you are transacting.

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. You are encouraged to speak with your financial representative to understand the costs involved in trading securities.

Q: What are your legal obligations to me when acting as my broker-dealer? How else does your firm make money and what conflicts of interest do you have?

A: *When we act as your broker*, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts of interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide. Here are examples to help you understand what this means:

- Commissions create an incentive for us to recommend that you trade more frequently, which may be contrary to your interests. Please be mindful of the impact of trade frequency and commission costs on your portfolio and the adverse impacts frequent trading can have on your portfolio returns.
- Podesta has an investment adviser affiliate, Podesta Capital Advisors, LLC. We may recommend either a brokerage account or an advisory account to you. You should consider the size of your portfolio, the number of securities, whether or not you want ongoing supervision of the portfolio, and the expected level of transaction activity before deciding on brokerage versus investment advisory. Please consult with your financial advisor and carefully review this client relationship summary and the public disclosure site at Investor.gov/CRS. please see Items 10, 11, and 14 of our affiliate's ADV Part 2A Brochure as well as your financial advisor's Part 2B Brochure Supplement for additional information about conflicts of interest.

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

A: Conflicts of interest can incentivize us to put our interests ahead of yours. We manage these conflicts through disclosures in this Form CRS, as well as product-specific disclosures (i.e., mutual funds, ETFs, private placements, REITs, and other illiquid securities). In addition, we employ supervisory procedures to ensure our financial professionals are acting in your best interest.

Q: How do your financial professionals make money?

A: Our financial professionals are paid a percentage of the total commission generated from their client accounts. The payment of commissions reduces your rate of return or increases your loss on securities transactions,

Disciplinary History

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

A: Yes, in April 1998, Podesta had a disciplinary record involving a monetary fine. None of Podesta's financial professionals have a disciplinary record. These records can be viewed by accessing Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Additional Information

Q: Who is my primary contact person?

A: Your Podesta financial professional will be your primary point of contact. However, administrative requests may be handled by an administrative assistant or client service professional.

Q: Is he or she a representative of an investment adviser or a broker-dealer?

A: Certain of our investment professionals are registered with our affiliate, Podesta Capital Advisors, LLC. All of our registered representatives are licensed with Podesta.

Q: Who can I talk to if I have concerns about how this person is treating me?

A: In the event you have issues to be addressed, you may contact Kim Donovan at 312-899-0133 or by email to kdonovan@podestaco.com.

You can find additional information about our investment services at Investor.gov/CRS. You may also request a printed copy of this Client Relationship Summary by contacting us at 312-899-0133 or via email to kdonovan@podestaco.com.