

Form ADV Part 3 Disclosure: Client Relationship Summary (Form CRS)

Covington Capital Management

Covington Capital Management (“Covington” or “Firm”) is registered with the Securities and Exchange Commission as an Investment Adviser.

Brokerage and investment advisory services and fees differ and it is important for you, the retail investor, to understand the differences. Free and simple tools are available to research firms and financial professionals at, www.Investor.gov/CRS. This website also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Covington offers investment advisory services to retail investors (high net worth individuals and families). Our minimum market value is \$2,000,000 per client relationship. Based on investment goals that you will establish with us, we will manage your investment portfolio by investing in individual stocks and bonds, mutual funds, stock and bond Exchange Traded Funds (ETFs), and in alternative investments (i.e., gold or real estate ETFs). Accounts can be established on either a discretionary basis, where our Firm chooses and executes trades based on the established investment guidelines, or on a non-discretionary basis, where our Firm chooses the investments based on the established investment guidelines, but must first receive your approval to execute the trades.

As part of our standard services, accounts are monitored closely and undergo a comprehensive investment review annually. More detailed information about our services can be obtained by referring to Item 4 and Item 7 in our Form ADV Part 2A, which can be found at, https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=639462

The following questions are intended to be “conversation starters” to ask your financial advisor (you will find conversation starters at the end of each section):

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?

Covington charges quarterly investment management fees in advance based on a tiered or fixed percentage of the assets under management. The tiered percentage fee decreases as the assets under management increases. However, the more assets there are in your investment advisory account, the more you will pay in fees and the firm has an incentive to encourage you to increase the assets in your account. We do not charge any additional fees. The custodian that holds your assets may charge commissions as well as transactions fees. Covington does not receive any compensation nor fees from your custodian. ETFs and mutual funds charge internal fees, which will reduce the value of the investment over time.

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.

Form ADV Part 3 Disclosure: Client Relationship Summary (Form CRS)

More detailed information about fees can be obtained by referring to Item 5 in our Form ADV Part 2A. See link above.

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 interests and not put our interests 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.

Though Covington does not maintain any proprietary investments, nor do we receive any fees or commissions from third parties when recommending or selling any investments, we receive more fees when you give us more assets to manage. Therefore, we must put your interests first to determine whether your assets will best be served by either leaving them where they are or moving them to our firm.

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

How do your financial professionals make money?

Our financial professionals receive a salary and are eligible for an annual bonus based on how well they performed their duties over the prior year. Subject to approval, salespersons and non-owners receive additional compensation for new fee revenue they source or co-source. A financial professional has an incentive to encourage you to move more assets to our firm.

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

No. For free and simple search tools to research our firm and financial professionals refer to, www.Investor.gov/CRS.

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

Additional Information

Additional information about Covington can be obtained at www.covingtoncapitalmanagement.com. To request a copy of our Form CRS you may contact Dwight Liu, Chief Compliance Officer, as follows:

Covington Capital Management
601 S. Figueroa Street, Los Angeles, CA 90017
213-629-7500
d.liu@ccmwealth.com

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?