

BERKELEY CAPITAL MANAGEMENT
ADV Part 3 Form CRS - Customer Relationship Summary
March 12, 2026

Item 1 - Introduction

Berkeley Capital Management (“Berkeley”) is registered with the U.S. Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory 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://investor.gov/CRS), which 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 offer customized investment and portfolio management services and financial planning. As part of our standard services, we monitor investments that we manage on a continuous and ongoing basis. We review accounts on at least an annual basis. The purpose of the review is to study the holdings in each account to determine if it remains suitable for the portfolio based on a number of criteria including investment objectives and risk tolerance. Also, the firm factors in market conditions and company specific news that may be relevant to the client account. Interim reviews may be triggered by material market, economic, or political events or by changes in the client’s financial situations

We accept discretionary authority to implement the recommended transactions in client accounts. A *discretionary account* allows us to buy and sell investments in your account without asking you in advance. There are not limits to our investment offerings. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. Our services are not subject to a minimum account size.

Additional information about our services can be found in Items 4 and 7 of our ADV Part 2A Disclosure Brochure available to all clients or by visiting: <https://adviserinfo.sec.gov/firm/summary/149229>.

Conversation Starters - Let’s discuss...

- “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, and Standards of Conduct

“What fees will I pay?”

The fees for our investment and portfolio management services are charges based on a percentage of assets under management according to the following fee schedule:

Assets Under Management	Annual Fee (%)
\$0 - \$399,999	1.20%
\$400,000 - \$999,999	1.00%
\$1,000,000 and above	0.80%

Fees are paid quarterly in arrears. The Client also authorizes the Advisor to deduct advisory fees directly from the Client's account. Fees are negotiable. Fees will be determined at the end of each quarter and will be based upon account(s) closing value, as reported by the account custodian on the last day of the quarter.

Financial planning fees are assessed on a fixed fee basis and are payable upon the completion of the plan.

All fees paid to the firm for investment management services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders as described in each fund prospectus. These fees will generally include a

management fee, other fund expenses, and a possible distribution fee. If the fund is sold on a short-term basis, the account could be subject to a short-term redemption fee. Clients may incur brokerage and other transaction costs.

The more assets there are in your advisory accounts, the more you will pay in fees, so the firm may therefore have an incentive to encourage you to increase the assets in your account or manage them in a way where we receive higher fees. 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.

Additional information about our fees can be found in Item 5 of our ADV Part 2A Disclosure Brochure available to all clients or by visiting: <https://adviserinfo.sec.gov/firm/summary/149229>.

Conversation Starters - *Let's discuss...* "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. The following is an example to help you understand what this means:

- Our Firm's owner does tax and accounting for some clients. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Berkeley always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any Berkeley representative in such individuals outside capacities.

Conversation Starters - *Let's discuss...* "How might your conflicts of interest affect me, and how will you address them?"

Additional information about our conflicts of interest can be found throughout our ADV Part 2A Disclosure Brochure available to all clients or by visiting: <https://adviserinfo.sec.gov/firm/summary/149229>.

"How do your financial professionals make money?"

Our financial professionals are compensated by an annual salary. They may also receive discretionary bonuses as determined by Berkeley's bonus structure and subject to Berkeley's policies and performance criteria.

Item 4 – Disciplinary History

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

No, neither we nor our financial professionals have a legal or disciplinary history. You can visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter - *Let's discuss...* "As a financial professional, do you have any disciplinary history? For what type of conduct?"

Item 5 - Additional Information

To obtain up-to-date information regarding our services or to request a copy of this customer relationship summary, please contact us at (785) 472-2375 or by visiting <https://adviserinfo.sec.gov/firm/summary/149229>.

Conversation Starters - *Let's discuss...* "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?"

Exhibit to Form CRS

Material Changes

Since our last update on 04/03/2025, Form CRS has been updated to reflect the following:

- We are now offering financial planning services for a fixed fee.