



FORM CRS

A SUMMARY OF YOUR ADVISORY RELATIONSHIP WITH CDKV HOLDINGS, LLC.

DBA: STEELE STREET PRIVATE WELATH MANAGEMENT

MARCH 8, 2023

ITEM 1 – INTRODUCTION

Steele Street Private Wealth Management is registered with the Securities and Exchange Commission (SEC) as an Investment Adviser. Brokerage and Investment Advisory services and fees differ, and it is essential for you to understand these differences. As an Investment Adviser, our Financial Professionals are paid a percentage of the assets under management, flat fee, or an hourly fee while Registered Representatives at a broker-dealer are paid commissions based on the investment products they recommend and sell. Free and simple tools are available to research firms and our Financial Professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, Investment Advisers, and general education about investing.

ITEM 2 – RELATIONSHIPS AND SERVICES

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Steele Street Private Wealth Management [“Firm”] provides the following Investment Advisory services:

Investment Management: Our Firm manages advisory accounts on a discretionary and non-discretionary basis. Our Firm continuously monitors your investments, and this service is included as part of the Firm’s standard advisory services. Our Firm requires a minimum account value of \$500,000 in order to provide advisory and financial planning services to you. However, we may accept accounts for less than the minimum at our sole discretion.

- **Discretionary:** You have granted written investment authority to your Financial Professional to execute purchase and sell orders in your advisory accounts without speaking with you first.
- **Non-Discretionary:** You have not granted written trading authority to your Financial Professional, and he or she will contact you before executing trades in your portfolio, and you retain the control to buy or sell each security recommended. As the retail investor, you make the ultimate decision regarding the purchase or sale of your investments.

Financial Planning: Our Firm offers financial planning services for all clients at no additional cost. Financial Planning services are available as part of our investment management services.

Consulting: Our Firm provides clients general investment recommendations on a limited basis. In these consulting engagements, you will be required to select your investment managers, custodian and/or insurance companies for the implementation of consulting recommendations.

PLEASE REFER TO OUR FIRM’S ADV PART 2A BROCHURE - ITEMS 4, 7, 8, 13 & 16

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Given my financial situation, should I choose an Investment Advisory service?
- 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?

Our Firm receives a fee as compensation for providing advisory services on your account. The investment management fee includes investment management supervision, trade entry, other account maintenance, and/or service activities. The custodian charges transaction costs, custodial fees, redemption fees, retirement plan, and administrative fees or commissions. Our investment management fees are based on a percentage of the total account value. Our maximum investment advisory fee is 1.50%, billed in advance on a quarterly basis. The more assets in your advisory account, the more you will pay in fees, and the Firm, therefore, has an incentive to encourage you to increase the assets in your account. Fees for consulting services are negotiated on an hourly or fixed dollar amount. Fees for consulting services are \$250.00 per hour or are a fixed dollar amount, not to exceed \$5,000.00. 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. Fees and costs affect the account value of your account over time. Please ask your Financial Professional about the fees.

FOR MORE INFORMATION REFER TO OUR FIRM’S ADV PART 2A BROCHURE – ITEM 5

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- How do 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 affect the recommendations, we provide you. Asset-based fees present a conflict because our Firm is incentivized by encouraging you to invest additional funds in your advisory accounts. The following are examples where asset-based fee compensation poses a conflict for firms: 1) When advising to rollover a 401(k) balance, even when equivalent and less costly options if funds are left with the employer's fund manager. 2) When advising not to pay off a mortgage (thus diminishing assets), even when the mortgage carries a high interest rate. 3) When advising against making a large charitable contribution to get a tax deduction (but decrease assets under management).

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

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

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our Firm's Financial Professionals are compensated by the investment advisory fees as described above in the fee section. Our Financial Professionals are compensated based on the amount of assets they service, the time and complexity required to meet the client's needs, or the revenue based on the recommendations provided by our Financial Professionals. Our Financial Professionals will earn additional compensation from participating in the following activities:

Our Firm's Financial Professionals are engaged in *outside business activities* and are required to disclose any material Outside Business Activities. Our Firm supervises the Outside Business Activities of our Financial Professionals through our compliance program and Financial Professionals are required to follow a Code of Conduct to mitigate any conflicts to you.

PLEASE REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEMS 5, 10, 11, 12, & 14

ITEM 4 – DISCIPLINARY HISTORY

DO YOU OR YOUR FINANCIAL REPRESENTATIVES HAVE DISCIPLINARY HISTORY?

No. Please visit www.investor.gov/CRS for a free and simple search tool to research us and our Financial Professionals. For additional information about our Financial Professionals and services, visit <https://brokercheck.finra.org/>, and our web site at www.steelestpwm.com.

PLEASE REFER TO OUR FIRM'S ADV PART 2A BROCHURE - ITEM 9

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- As a Financial Professional, do you have any disciplinary history?
- For what type of conduct?

ITEM 5 - ADDITIONAL INFORMATION

For additional information about our investment advisory services visit the SEC's website at www.adviserinfo.sec.gov. Our Firm's IARD number is: 299856. You may also contact us directly for up-to-date information and to request a copy of the relationship summary at: 720-730-2550.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Who is my primary contact person?
- Who can I talk to if I have concerns about how this person is treating me?

MATERIAL CHANGES SINCE LAST FILING

On March 8, 2023, the Firm updated Form CRS for annual amendment. No material changes were made.