

21PEAKS CAPITAL MANAGEMENT, LLC
4851 Tamiami Trail, Suite 200
Naples, FL 34103
Form CRS – Client Relationship Summary
December 1, 2025

Introduction

21Peaks Capital Management, LLC (“21Peaks Capital”, “we”, or “us”) is an investment adviser registered with the United States Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to high-net-worth, ultra-high-net-worth individuals and their families, as well as to institutions and other advisors. We have a preferred minimum relationship size of \$500,000. We may consider clients with less than this minimum at our discretion.

Additional information: For additional information, please see Item 4 and Item 7 of our disclosure brochure, Form ADV Part 2A, a copy of which you should have received.

Conversation starters. Ask your financial professional:

- *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?

Clients pay 21Peaks Capital a management fee quarterly in arrears. For more detailed information about the fees you will pay, please refer to Item 5 of our disclosure brochure, Form ADV Part 2A, a copy of which you should have received.

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 may pay fees and costs separate from our services, and regardless of whether you make or lose money on your investments. These additional fees may include transaction and execution charges and the fees/expenses charged by any custodian, and other transaction-related costs, electronic fund and wire fees, and any other fees that reasonably may be borne by a brokerage account. You will pay a margin interest percentage to a broker-dealer if you opt in to margin services.

Conversation starters. Ask your financial professional:

- *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?*

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. Here is one example to help you understand what this means:

- Some of our fee structures give us the incentive to encourage clients to increase their account balance.

Additional information: For additional information about our personal trading procedures and code of ethics for our financial professionals, please see Item 11 of our disclosure brochure, Form ADV Part 2A, a copy of which you should have received.

Conversation starters. Ask your financial professional:

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

How do your financial professionals make money?

Our financial professionals are paid cash or cash equivalent compensation as salary based on their experience.

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

No. Visit investor.gov/CRS for a free and simple search tool to research our financial professionals.

Conversation starters. Ask your financial professional:

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

Additional Information

If you would like additional, up-to-date information or a copy of this disclosure, please call (833) 948-6937 or email bill@21peakscapital.com.

Conversation starters. Ask your financial professional:

- *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?*