

Item 1 – Introduction: Is an investment advisory account right for you?

Berkeley Inc. (“Berkeley”) is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ and that 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 – What investment services and advice can you provide me?

Our services include investment and portfolio advice and management and financial planning for individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and small businesses. Our firm is a fee only (refer to Item 3) investment advisory firm. After we agree on an investment strategy, you grant us discretion (we determine for you) how we manage your account. Your account is custom-tailored to your specific investment objectives. We do not use “wrap programs” or other mass distribution programs. We manage accounts on a client-by-client basis, and often on an account-by-account basis.

The minimum annual fee for starting and maintaining an advisory relationship is \$2,500. We, at our sole discretion, may accept clients with smaller portfolios or lower minimums based upon certain factors, which are listed in our ADV Part 2A. All accounts are regularly monitored and reviewed with you by your assigned advisory representative, initially and at least annually or as agreed upon with you. The reviews focus on consistency of portfolio investments with investment objectives and risk tolerances. We do not limit our advice to proprietary products, or a limited menu of products or types of investments.

Account supervision is guided by the client's stated objectives (e.g. conservative, moderate, balanced, growth, aggressive), as well as tax considerations. Based on these considerations, Berkeley will select specific investments for your portfolios using fundamental and technical analysis, as well as, charting. Berkeley will exercise discretionary authority over your account, which means we will select the amount of securities bought and sold for your account with or without your prior approval.

For additional information, please refer to Items 4, 7, & 13 of our Form ADV Part 2A at the following link:
<https://adviserinfo.sec.gov/firm/brochure/117667>

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?*

Item 3 – What fees will I pay?

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.

Our portfolio management fee is based on the total market value of your account on the last day of the quarter following your account's effective date. Fees for individually managed accounts are priced within a range of 0.35% to 0.90% depending upon the amount of the assets in the account, the complexity of the financial plan and the advisory services necessary for the Client. The asset management fee will be determined at the time of the advisory agreement.

For example, our fee on a \$500,000 account at 0.90% would be \$4,500 per year, deducted quarterly at \$1,125 per quarter. The asset-based fee reduces the value of your account and will be deducted from your account. As your investment adviser, we must act in your best interest and not put our interest ahead of yours.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The financial planning fee range is usually \$2,000-\$5,000 and is negotiable. Clients who have obtained financial planning services from the firm can obtain plan updates for a negotiable hourly fee of up to \$500.

For additional information regarding our fees, please see Item 5 of our Form ADV Part 2A at the following link:
<https://adviserinfo.sec.gov/firm/brochure/117667>

Description of Other Fees and Costs: The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by investment companies (e.g., mutual funds, exchange traded funds, unit investment trusts and variable annuities). These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian that executes the trade. The

broker-dealer or custodian may also charge your account for custodial fees, retirement account fees, trust fees, exchange fees, redemption fees that may be assessed on investment company shares, transfer fees, account termination fees or other special service fees and charges. We do not share in any portion of these fees imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our firm, and others. **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.**

For additional information about fees charged by third parties, please refer to Item 5 of Form ADV Part 2A at the following link: <https://adviserinfo.sec.gov/firm/brochure/117667>

Conversation Starter. Ask your financial professional—

- ❖ *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. Here are some examples to help you understand what this means:

- All investment advisers face conflicts of interest which are inherent in the business. Our primary source of compensation is through asset-based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management.
- Berkeley and/or its investment advisory representatives will from time-to-time purchase or sell products or investments that they recommend to clients for their own accounts.
- We have relationships with third party service providers, including other financial institutions such as our custodian, Charles Schwab & Co., Inc., which results in inherent conflicts of interest.

Conversation Starter. Ask your financial professional—

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

Please refer to our Form ADV Part 2A for further information on our conflicts of interest and how we address them at the following link: <https://adviserinfo.sec.gov/firm/brochure/117667>

How do your financial professionals make money?

Our financial professionals receive salary-based compensation and/or bonuses based on overall firm performance. Additionally, financial professionals who have an ownership interest in our firm share in the profits generated by our firm.

Item 4 – Do you or your financial professionals have legal or disciplinary history?

No.

For a free, simple search tool to research us and our financial professionals please visit Investor.gov/CRS.

Conversation Starter. 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 advisory services, please refer to our Form ADV Part 2A brochure available at <https://adviserinfo.sec.gov/firm/brochure/117667> and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information and/or need a copy of this Client Relationship Summary, please contact our Chief Compliance Officer, Megan Parrish, at (208) 853-6980.

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?*