

BERKELEY INC.

Form ADV-CRS (Customer Relationship Summary) Part 3

January 31, 2024

Item 1: Introduction

Berkeley Inc. (“Berkeley”) is an investment adviser registered with the United States Securities and Exchange Commission. Such registration does not imply competence. Free and simple tools, and educational materials about broker-dealers, investment advisers, and investing are available to research firms and financial professionals at <https://www.Investor.gov/CRS>.

Item 2: Relationships and Services

What investment services and advice can you provide to me?

It is important for you, the customer to understand the difference in fees and services between brokerage firms and investment advisers. 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 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.

How will we choose investments to recommend for your account?

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 through the use of 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.

Conversation starters: We encourage you to ask your finance advisor these key questions:

- 1) *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- 2) *How will you select investments under your discretionary authority?*
- 3) *What is your relevant experience and educational background in the financial services business? What do your qualifications mean?*

Item 3: Fees, Costs, Conflicts and Standard of Conduct

What fees will you 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 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 0.45% 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.

Please note, 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 will be paying.

Mutual funds and ETFs recommended by Berkeley have underlying fees that are disclosed in their prospectuses. Other costs incurred in your account may include prime broker charges, wire transfer and electronic fund transfer fees, fees and taxes on brokerage accounts and securities transactions. We do not collect any fees or revenue from these products.

What are our legal obligations to you as an investment adviser?

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.

Example 1: Berkeley and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. In such circumstances, Berkeley or its investment adviser representatives may have a financial interest in recommending investments that Berkeley or its representatives also own.

How do your financial professionals make money?

Berkeley and its investment adviser representatives receive a salary as well as compensation based on a percentage of your assets under management. As the value of your assets under management increases, total compensation you pay to Berkeley and its representatives also increases. However, if your account value decreases, you will still pay a fee to Berkeley and its representatives.

How might our conflicts of interest affect you, and how will we address them?

Because Berkeley charges clients a fee based on the value of the client's assets under management, we benefit from the advisory services we provide to you. Since our income comes from the fee we charge, we may take risks to increase your assets so we can earn additional income. We also have an incentive to encourage clients to allocate greater assets to our management services. However, our portfolio management standards and compliance procedures provide guidance to manage your account in accordance with your best interest regardless of this conflict.

Conversation starter: *If you have any questions concerning our fees or conflicts of interest, please feel free to ask us questions, such as: "How may your conflicts of interests or fee structure affect me, and how will they be addressed?"*

Item 4: Disciplinary History

Do we or our financial professionals have legal or disciplinary history?

No. We encourage you to visit investor.gov/CRS for a free and simple search tool to research any of our financial professionals.

Conversation starter: *Feel free to ask: "As a financial professional, do you have any disciplinary history? For what type of conduct?"*

Item 5: Additional Information

Where is additional information available?

You should independently confirm all of the information stated here with our other regulatory filings. For additional information on our investment advisory services, see our Form ADV, along with the brochure supplement on each of our financial professionals, on IAPD on Investor.gov. Information regarding our firm can be found at adviserinfo.sec.gov or by calling our firm at the telephone number listed below for up-to-date information. If you have a problem with your investments, investment account or a financial professional, contact us in writing at the address listed above. If you fail to gain timely satisfaction through this course of action, you may wish to report the problem to the SEC at Investor.gov or call the toll-free investor assistance line at 800-732-0330.

Conversation starter: *we welcome you to ask "Who is my primary contact? Is he or she a representative of an investment adviser representative? With whom may I speak if I have concerns about my primary contact?"*

Your adviser serves as your primary contact with our firm. If you have concerns about how this person is treating you, you should contact our Chief Compliance Officer, Megan Parrish, at (208) 853-6980.