

March 19, 2024

Introduction

Keen Capital, LLC is registered with the Securities and Exchange Commission as an investment adviser.

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?

Keen Capital offers investment advisory services to retail investors. We will meet with you to identify and discuss your financial goals, financial needs, and the level of investment risk that you are willing to bear. We will then build a portfolio of investments (including investment restrictions) including stocks, exchange traded funds ("ETFs"), mutual funds, bonds, private fund vehicles, real estate, and other investments that can help you meet those goals and financial needs. If you provide Keen Capital with discretionary authority, we will make investment decisions for your account and execute trades on your behalf. Keen Capital also offers non-discretionary services, meaning that we will discuss our trade recommendations with you, but you will make the ultimate decisions regarding the purchase or sale of securities.

Our Firm requires a minimum account value of \$2,000,000 to provide advisory services to you; this minimum portfolio value requirement is negotiable. If deemed appropriate for you, our Firm will recommend utilizing an independent Third-Party Money Manager (TPMM) to aid in the implementation of investment strategies for your portfolio. Wealth planning services are included within the investment management advisory fee. *Additional information can be found in Item 4 of our Firm Brochure (Form ADV, Part 2A):* <https://adviserinfo.sec.gov/>.

QUESTIONS TO 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?

Our Firm receives a fee as compensation for providing advisory services on your accounts. The investment management fee includes investment management supervision, trade entry, and other account maintenance, service activities, and wealth planning services. The custodian can charge transaction costs, custodial fees, redemption fees, etc. Our Firm's advisory fees are billed as a percent of assets under management or as a flat fee, assessed quarterly in arrears, and deducted from client account(s). The fee percentage depends on the household total of assets; smaller households will pay a higher percentage than households with larger total account values, but no fee shall exceed 1% except for those clients that do not meet a minimum level of assets. The Firm has an incentive to encourage you to increase the asset value in your account. You will pay fees and costs whether you make or lose money on your investments. Please make sure you understand what fees and costs you are paying.

You may be charged additional fees and/or expenses by third parties that include, but are not limited to, custodial fees, brokerage commissions, transaction fees, and fees related to mutual funds, ETFs, &

annuities. Private funds which Keen Capital recommends to you may charge their own management fees and performance fees. These fees are paid by you in addition to the management fees you pay to Keen Capital. *Additional information can be found in Item 5 of our Firm Brochure (Form ADV, Part 2A): <https://adviserinfo.sec.gov/>.*

QUESTIONS TO 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 Keen Capital acts as your investment adviser, we must 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 to you.

Here are some examples to help you understand what that means:

- Keen Capital utilizes Charles Schwab & Co. (Schwab) to provide custodial services to client accounts. Schwab also provides certain support services related to the transition of client accounts from other investment advisers to Keen Capital. You do not pay more as a result of this arrangement, but our firm benefits as these costs are not borne by Keen Capital.
- From time to time, representatives of Keen Capital may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of the firm to buy or sell the same securities before or after recommending the same securities to clients.

Additional information can be found in Item 11 of our Firm Brochure (Form ADV, Part 2A): <https://adviserinfo.sec.gov/>.

QUESTIONS TO 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 either a variable or fixed monthly or quarterly amount. Each financial professional receives a salary and compensation based upon the overall revenue of the firm.

Do you or your financial professionals have legal or disciplinary history

No, our firm and/or financial professionals do not have any legal and/or disciplinary history. Visit <https://Investor.gov/CRS> for a free and simple search tool to research our firm and our financial professionals.

Additional Information

For additional information about our investment advisory services visit the SEC's website at www.adviserinfo.sec.gov. Our firm's CRD number is 283597. You may also contact us directly for up-to-date information and request a copy of the relationship summary at: 267-454-4503

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Who is my primary contact person? Is he or she an investment adviser or a representative of a broker/dealer? Who can I talk to if I have concerns about how this person is treating me?