



**ADV Part 3 -Customer Relationship Summary (Form CRS)**  
March 07, 2024

**Item 1 – Introduction**

We are registered with the SEC as an investment adviser. Brokerage and investment advisory services fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at <http://investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers and investing.

**Item 2 – Relationships and Services**

**What investment services and advice can you provide me?**

Our firm offers portfolio management services, financial planning services, and selection of other advisors; which are fully described in our Form ADV Part 2A (“Disclosure Brochure”). Our services include portfolio management to individuals, endowments, trusts, estates, corporations, large businesses, foundations, and small businesses. We also offer financial planning as a complimentary service for our portfolio management clients. Our firm may also serve as a subadvisor for fixed-income portfolios of other financial institutions. As part of our investment management services, we regularly monitor accounts. There are no material limitations to our monitoring. We accept discretionary authority to implement the transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. We do not offer advice only with respect to proprietary products. We offer advice on equity securities, investment company-issued securities, fixed-income securities, government-issued securities, private placements, and the money market. Where appropriate, we provide advice about any type of legacy position or other investment held in your portfolio; however, you should not assume that these assets are being continuously monitored or otherwise advised on by us unless specifically agreed upon. Our firm does not require a minimum account size.

**For additional information**, please see our Form ADV 2A Brochure, specifically Items 4 and 7 at:  
<https://adviserinfo.sec.gov/firm/brochure/322725>.

**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 – Fees, Costs, and Standards of Conduct**

**What fees will I pay?**

Our fees are based on a percentage of assets under management per annum. The management fee will be based on the average daily balance for the preceding month as reported by the qualified custodian. The highest fee a client will pay is 1.00%, while the lowest fee a client will pay is less than 0.50% and negotiable, depending on the account size. Sub-advisory account management fees will be based on the average month end balance as reported by the qualified custodian. The highest a sub-advisory account will pay is 0.20%, while the lowest a sub-advisory account will pay is 0.05%. We will recommend private funds and charge a management fee on those assets. All asset-based fees are deducted by the qualified custodian of record on a monthly, or quarterly (for sub-advisory accounts) basis in arrears, or as otherwise indicated in the client agreement. During the initial period of engagement, the fee is calculated on a pro rata basis. In the event the agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the unearned portion of the fee is returned to the client.

In addition to the advisory fees paid to us, you also incur specific third-party charges. For example, broker-dealers, prime brokers, third-party money managers, and custodians impose charges. These charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by independent managers, and margin costs. As well as charges imposed directly by a mutual fund or ETF in a client’s account as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and additional fees and taxes on brokerage accounts and securities transactions.

The more assets there are in your advisory accounts, the more you will pay in fees, so the firm may therefore have an incentive to encourage you to increase the assets in your account or manage them in a way where we receive higher fees. Whether you will pay fees and costs if you make or lose money on your investments. Fees and expenses will reduce any money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

**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 more detailed information, please see our [Form ADV Part 2A Brochure](#) (specifically Item 5).**

Other costs incurred in your account may include wire transfer and electronic fund transfer fees, and fees and taxes on brokerage accounts and securities transactions. We do not collect any fees or revenue from these products.

**Conversation Starters.** *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 are obligated to act in your best interests 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. The following is an example to help you understand what this means:

- Our firm 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, our firm or its investment adviser representatives may have a financial interest in recommending investments that our firm or its representatives also own.
- Our firm offers preferential advisory fees to sub-advised clients, however, sub-advised clients are also paying an advisory fee to their main advisor.

**For more detailed information, please review our [Form ADV, Part 2A Brochure](#) (specifically Items 10 and 11).**

**Conversation Starters.** *Ask us the following questions:*

- “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 compensated based on the following factors and conflicts of interest: As the firm’s owner, Brendan Keelan receives a distribution of the firm’s profits.

Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.

#### **Item 4 – Disciplinary History**

**Do you or your financial professionals have legal or disciplinary history? For what type of conduct?**

No, neither we nor our financial professionals have a legal or disciplinary history. You can visit <http://investor.gov/crs> for a free and simple search tool to research us and our financial professionals.

**Conversation Starters.** *Ask our financial professionals:*

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

#### **Item 5 – Additional Information**

For additional information on our investment advisory services and to request a copy of the relationship summary, go to IAPD at <https://adviserinfo.sec.gov/firm/summary/322725>. To obtain up-to-date information and request a copy of the Customer Relationship Summary, please contact Brendan Keelan at 404-421-8000 or [Bk@keelancap.com](mailto:Bk@keelancap.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?”

## **Exhibit 1 – Material Changes**

This copy of the Customer Relationship Summary was updated on March 07, 2024. The following material changes were made:

- In Item 3, we amended our billing frequency, fee ranges, removed fee types for services we no longer offer, disclosure of preferential fees for sub-advised clients, and included disclosures about fees for recommendations of private funds.
- Throughout the document, there have been immaterial updates to the formatting.