
INTRODUCTION

Steele Street Capital, LLC (“SSC”) 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 the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

SSC has four main lines of its business:

- Investment advisory services to individuals and families with moderate assets, which is performed under the trade name, “Steele Street Capital Ascent”;
- Retirement plan management and business transition services to entities, which is performed under the trade name “Steele Street Planning”;
- Asset management and consulting services to retirement plans, as well as business transition services to entities, which is performed under the trade name “Steele Street Solutions”; and
- Investment advisory services for individuals, families and their affiliated trusts, businesses and other entities, which is performed without a separate trade name.

SSC manages money on a discretionary basis and may utilize programs offered through the custodian, LPL Financial LLC (“LPL”). Accounts that utilize the LPL programs are wrap fee programs. Additionally, SSC offers business transition services and cash management services.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business.

➤ ***Questions to Ask Your 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?

Investment advisory fees range from:

- 0.35% to 2.00% per year for Steele Street Capital or a fixed fee with a minimum of \$3,750 per year;
- 0.125% to 1.50% per year for Steele Street Capital Ascent or a fixed fee with a minimum of \$1,875 per year;
- 0.10% to 0.50% for Steele Street Solutions with a minimum fee of \$2,500;
- An hourly rate of \$300 or annual flat fee with a minimum of \$2,500 but not to exceed \$25,000 for Steele Street Planning; and
- For business transition services and cash management services, SSC charges an hourly fee of \$350 or an annual fixed fee ranging from \$10,000 to \$50,000.

SSC fees will be debited directly from each client’s account. The advisory fee is paid quarterly, in advance, and the value used for the fee calculation is the net value as of the last market day of the previous quarter, including any cash in the client’s account. For example, if your annual fee is 1.00%, each quarter we will multiply the value of your account by 1.00%, then divide by the number of days in that calendar year and multiply that number by days in the quarter to calculate our fee. Fixed fees are charged quarterly by dividing the annual fee amount by 4.

There are a number of other fees that can be associated with holding and investing in securities. For clients participating in SSC’s wrap program, these include some fees that may be paid by CCS on your behalf, such as transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. All other fees will be deducted from your account. Expenses of a mutual fund or ETF will not be included in management fees, as they are deducted from the value of the shares by the manager. Fees charged

by independent third party managers are also separate and additional to any fees paid to SSC, and such managers will be authorized to separately debit fees from client accounts. 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 specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation.

➤ **Questions to Ask Your 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.

SSC nor it's related persons have any conflicts to disclose other than the above.

For more specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation, as well as Item 10.C of the ADV Part 2A for more information regarding related persons.

➤ **Questions to Ask Your Professional:**

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

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Financial professionals of SSC are paid a portion of the asset management fees collected from clients. Financial professionals are not rewarded sales bonuses. Please reference the above fee description section for conflicts of interest.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS).

➤ **Questions to Ask Your Professional:**

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

ADDITIONAL INFORMATION

Additional information about our investment advisory services can be found at www.steelestreetcapital.com. A copy of our relationship summary can also be requested by calling (207) 475-0060.

➤ **Questions to Ask Your 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?”*