



Item 1: Introduction

GKV Capital Management Co, Inc. is an investment adviser registered with the Securities and Exchange Commission. It is important for you to understand the difference in fees and services between brokerage firms and investment advisers. Our intention is that the following information will clarify our investment advisory services. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS.

Item 2: Relationships and Services

What investment services and advice can we provide you?

We offer investment advisory services to retail investors. Our firm is a fee-based (refer to Item 3) investment advisory firm. You grant us discretion (we determine for you) how the account will be allocated. Your account is custom-tailored to your specific investment objective. We do not use model portfolios. We manage accounts on a client-by-client basis. GKV usually requires that clients maintain a minimum asset under management value of \$500,000.

How will we choose investments to recommend to you?

We begin by reviewing your financial situation and try to learn the important facts. We use individual stocks (occasionally exchange traded funds-ETFs or mutual funds) and/or bonds. A financial professional, referred to as a portfolio manager, is assigned to the day-to-day management of your account. There is ongoing communication and face-to-face meetings with you. We encourage you to contact us whenever you have questions, comments or concerns. We are an investment adviser, not a broker-dealer. Therefore, you select a brokerage firm or bank to handle your security purchases and hold your assets in safekeeping.

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?

Fees and costs affect the value of your account over time. Stocks or exchange-traded funds can have a separate commission. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a "mark-up" or "mark down").

Our fee is based on the total market value of your account on the date preceding the account's effective date. The fee is one-quarter (1/4) of the annualized fee recalculated quarterly based on the current market value of the assets, payable at the beginning of the quarter. Our fee is 1% on the first \$3,000,000 of assets, with the percentage decreasing as dollars under our management increases over \$3,000,000.

How can we help you understand how the fees and costs might affect your investments?

If we manage \$1,000,000, the fee will calculate to be \$10,000 annually. Refer to our Firm Brochure-Part 2A of Form ADV-Item 2 for additional information on our fee schedule. Your fee does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted from your account. In some cases, you will pay transaction-based fees when we buy or sell an investment for you (e.g., applicable commissions paid to broker-dealers for buying or selling investments) in addition to our firm's fee for the management of your account. You may experience fees paid to a broker-dealer or bank that holds your assets.

The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account to increase our fees. You pay fees and costs whether you make or lose money on your investments. Fees and costs reduce your investment over time. Please make sure you understand what fees and costs you are paying.

As your investment adviser, we will act in your best interest and not put our interest ahead of yours.

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

Our firm does not receive any payments from anyone besides you in the form of our management fees. Presently we do not share our fee with any third party. Any changes to this policy or new potential conflicts will be immediately disclosed to you.

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

How do your financial professionals make money?

Our financial professionals are compensated on a salary basis.

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?

Seek out additional information. Visit Investor.gov for a free and simple search tool to research our firm and our financial professionals.

To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, investment account or a financial professional, contact us in writing at 1350 Treat Blvd., Suite 260, Walnut Creek, CA 94597.

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 (805) 497-2616 for up-to-date information.

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?"

Who is your primary contact person at our firm?

You may reach our Chief Compliance Officer, Greg Vogel, at 925-627-8680, and your concerns will be addressed immediately.