

## Introduction

Our firm, Peavine Capital, LLC, is an investment adviser registered with the Securities and Exchange Commission. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

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

We are a registered investment adviser that offers investment management and advisory services. Our Direct Investment Management service includes asset management and periodic financial advice in the form of consultations at no additional fee. Our Sub-Advisory Investment Management service makes our investment strategies available to third party investment advisory firms who access our models via a licensing agreement with a third-party asset management platform.

For our Direct Investment Management service, if you open an advisory account with our firm, we will meet with you at least once (in person or via telephone) to understand your current financial situation, existing resources, objectives, and risk tolerance. Based on what we learn, we will recommend a portfolio of investments that is monitored at least monthly and if necessary, modified to meet your changing needs and goals. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio.

We manage accounts on a discretionary basis. After you sign an agreement with our firm, we are allowed to buy and sell investments in your account without asking you in advance. Any limitations are described in the signed advisory agreement. We have discretion until the advisory agreement is terminated by you or our firm.

We do not restrict our advice to limited types of products or investments.

Our firm requires a minimum account balance of \$20,000,000 to accept a new client for our Direct Investment Management Service. However, exceptions may be made on a case by case basis at the sole discretion of our firm's owners.

*Additional information about our advisory services is in Item 4 & 7 of our Firm Brochure which is available online at <https://adviserinfo.sec.gov/firm/summary/159922>.*

### Questions to Ask Us:

- 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 those qualifications mean?

## What fees will I pay?

You will be charged an ongoing quarterly fee based on the value of the assets in your account on the last day of the prior quarter. Our maximum Direct Investment Management annual fee is 1.00%. Since our fee is based on the value of the assets, typically the more assets you have in your account, the larger your total dollar fee may be. We therefore have an incentive to increase the assets in your advisory account in order to increase our fees. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. Our firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account. In rare cases, we will agree to send you invoices rather than automatically deduct our fees from your advisory account.

The custodian that holds your assets may charge you a transaction fee when we buy or sell an investment for you. Any custodian transaction fees are in addition to our firm's fees for our Direct Investment Management service. The custodian may also charge other account operation fees.

You may also pay charges imposed by the custodian holding your assets for certain investments and maintaining your account. Some investments, such as mutual funds and exchange traded funds, charge additional fees that will reduce the value of your investments over time.

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.

*Additional information about our fees is in Item 5 of our Firm Brochure which is available online at <https://adviserinfo.sec.gov/firm/summary/159922>.*

**Questions to Ask Us:**

- Help me understand how these fees and costs may 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. Here are some examples to help you understand what this means:

Our firm has an arrangement with Fidelity Brokerage Services, LLC which provides our firm with Fidelity's "platform" services. The platform services include brokerage, custodial, administrative support, record keeping and related services that are intended to support our firm in serving of our clients but may ultimately benefit our firm in conducting business. Fidelity also makes available at no additional cost services, portfolio evaluation services, financial database software and services, computerized news and pricing services, quotation equipment for use in running software used in investment decision-making, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. As a result of receiving these services, our firm has an incentive to continue to use Fidelity's services.

*Additional information about our conflicts of interest is in Item 10 & 12 of our Firm Brochure which is available online at <https://adviserinfo.sec.gov/firm/summary/159922>.*

**Questions to Ask Us:**

- 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 revenue our firm earns from investment management and advisory services.

**Do you or your financial professionals have legal or disciplinary history?**

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. Visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Questions to Ask Us:**

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

**Additional Information**

You can find additional information about our firm's investment advisory services on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #159922. You may also contact our firm at (775) 337-3900 to request a copy of this relationship summary and other up-to-date information.

**Questions to Ask Us:**

- 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?