

FORM CRS
VAVRA CAPITAL MANAGEMENT, LLC
FEBRUARY 24, 2026

ITEM 1: INTRODUCTION

Vavra Capital Management, LLC (“VCM,” “us,” “we”) is an SEC registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. Services and fees offered by investment advisory firms like VCM differ from those offered by brokerage firms 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://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?

We offer investment advisory services to retail clients (“you” and “your”). Our services include Investment Supervisory and Financial Planning Services.

Through personal discussions in which goals and objectives based on your circumstances are established, we develop an investment policy and subsequently build and manage your portfolio based on that policy. During the data-gathering process, we determine your investment objectives, time horizon, risk tolerance, and liquidity needs. As appropriate, we also review and discuss your prior investment history, as well as family composition and financial background. We do not generally impose a minimum account size, although we reserve the right to do so in the future, if such a minimum is necessary to assist you in achieving your investment objectives. Please see Items 4 and 7 of our Brochure at <https://adviserinfo.sec.gov/firm/brochure/149307> for more information.

Conversation Starter:
Given my financial situation, should I choose an investment advisory service? Why or why not?

Conversation Starter:
How will you choose investments to recommend to me?

Under Investment Supervisory Services, we exercise full investment discretion over your accounts. This means that at the outset of an advisory relationship, you authorize us to make portfolio decisions without your prior approval. This includes decisions about which security to trade, the quantity, price, time, and commission rate, if any. You may impose reasonable restrictions, such as security or industry limitations. As part of our standard services, our investment professionals monitor

Conversation Starter:
What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

your accounts on a regular basis through meetings and discussions of investment ideas, market conditions, securities held in accounts, and performance. Generally, investment decisions are applied across all client accounts managed within a particular strategy, though there are differences due to client restrictions, cash flows, etc. For more information about how we monitor your account, please see Item 13 of our Brochure at <https://adviserinfo.sec.gov/firm/brochure/149307>.

ITEM 3: FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay?

For Investment Supervisory Services, our fee for the management of your account is based on an annual percentage of the account’s assets under management, including money market instruments and cash. The annual fees for Investment Supervisory Services are based upon a percentage of assets under management and generally range from 0.50% to 1.00%. Fees are generally computed and payable

quarterly, in arrears, based on the market value on the last business day of each prior quarter. Initial and terminating periods will be calculated pro-rata, with excess fees repaid as applicable. Negotiated fee schedules depend on a client's particular needs, overall relationship, and other unique factors. Financial Planning Services are usually incorporated in our Investment Supervisory Services, but if provided separately, they are subject to hourly or fixed fees. The more assets we manage for you, the greater our potential fee and so we have an incentive to encourage increased account assets. Our fees do not include brokerage commissions, transaction fees, custodial fees, and other similar charges. If your portfolio holds a mutual fund or exchange-traded fund, you will also indirectly bear your share of fees and expenses charged by each fund.

Conversation Starter: 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?

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 information, please see Items 5 and 12 of our Brochure at <https://adviserinfo.sec.gov/firm/brochure/149307>.

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?

Conversation Starter: How might your conflicts of interest affect me, and how will you address them?

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. We generally recommend a particular custodian from whom we receive support services. This presents a conflict of interest, because our receipt of support services makes us more inclined to continue using and recommending them. Also, our investment professionals are permitted to buy and sell the same securities we buy and sell on your behalf. Please see Items 10 and 11 of our Brochure at <https://adviserinfo.sec.gov/firm/brochure/149307> for more information about our conflicts of interest and how we seek to mitigate them.

How do your financial professionals make money?

Our investment professionals receive a share in firm profits, if any. This presents a conflict because we may take risks to increase assets under management and fees to positively impact profit potential.

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

ITEM 4: DISCIPLINARY HISTORY

Do you or your financial professionals have legal or disciplinary history? No. We have no legal or disciplinary events to report. Please visit

[Investor.gov/CRS](https://investor.gov/CRS) for a free

and simple search tool to research VCM and our investment professionals.

ITEM 5: ADDITIONAL INFORMATION

Conversation Starter :

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?

For additional, up-to-date information about the advisory services we offer, or to request a current copy of Form CRS, please call us at 610-489-3018 or email us at info@vcm-wealth.com.