

VVR Holdings, LLC dba Capstone RIA – Form CRS**Item 1 – Introduction**

VVR Holdings, LLC dba Capstone RIA (“Capstone”, “we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differ from a registered broker-dealer, and it is important for you to understand the differences between those structures. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing. The italicized sentences appearing in text boxes below are intended to be “conversation starters” for you to have with us, as required by the instructions to Form CRS.

Item 2 – Relationships and Services - What investment services and advice can you provide me?

As fiduciaries, Capstone provides customized discretionary and non-discretionary investment advisory and financial planning and consulting services to individuals, including high net worth individuals and families (“you” or “clients”). We provide these services based on each client’s unique circumstances, including their investment objectives, risk tolerance, investment time horizon, withdrawal requirements, tax considerations, and other special circumstances, which we develop through discussions/meetings with our clients. We monitor portfolios periodically and make changes to them as we deem necessary. When we manage portfolios on a discretionary basis, we have the authority to buy and sell investments in your accounts without speaking to you before doing so. However, you can place reasonable restrictions on the securities that we buy by notifying us, in writing. We do not have to limit the type of securities we trade for clients to proprietary products or a limited group or type of investment, but we generally construct and manage portfolios containing open-end no load mutual funds, with the remainder primarily allocated among exchange traded funds (“ETFs”), stocks, bonds, real estate, alternative investments (such as commodities funds) and cash. We may also agree to provide financial planning and consulting services on a stand-alone separate fee basis. When we provide those services, we rely upon the information clients provide and do not verify or monitor that information because we do not directly implement any aspect of a client’s financial plan, except for the ongoing management of a client’s investments. We monitor portfolios on a periodic basis as part of our advisory services. Account reviews are conducted semi- annually and annually depending on the complexity of the client. While we do not monitor certain client-directed securities purchases, we do consider such securities part of the client’s overall asset allocation, tax strategy, risk and financial planning goals, and such assets are included under our investment management fee.

Capstone has no minimum account size for opening or maintaining an account for our investment advisory services. In the event that the client is subject to an annual minimum fee, the client could pay a higher percentage fee than referenced below. Our minimum fee may be waived, reduced, or increased at our sole discretion.

For more detailed information about our Advisory Business and the Types of Clients we generally service, please see Items 4 and 7, respectively in our [Form ADV Part 2A](#).

Conversation Starters:

<i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>

<i>How will you choose investments to recommend to me?</i>

<i>What is your relevant experience, including your licenses, education and other qualifications?</i>

<i>What do these qualifications mean?</i>

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct**What fees will I pay?**

Capstone provides discretionary and non-discretionary investment advisory services, including financial planning, on a *fee* basis. Capstone’s annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under its management, including cash and accrued interest on bonds and dividends payable on mutual funds (between 0.80% and 1.00%). Capstone, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive fee in its entirety, or charge fee on a different interval, based upon certain criteria (i.e. dollar amount of accounts to be managed, related accounts, account composition, complexity of the engagement, services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, etc.). As a result, similarly situated clients could pay diverse fees. Because this fee is based on the amount of your assets under our management, the more assets you designate to us for management, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you designate for our management. Additionally, as further disclosed on Part 2A of our Form ADV, cash positions (money markets, etc.) shall be included as part of assets under management for purposes of determining your advisory fee. We deduct and/or bill clients for our fees quarterly in advance, based upon average daily balance. When advising clients who participate in employee benefit plans held away from Schwab, Capstone will utilize the Pontera Platform. Pontera will directly bill Capstone an annual fee for the assets under management contained in such accounts, quarterly in advance. For assets managed using the Pontera Platform, Capstone will charge the client up to 3.00% of the Clients total AUM (assets held at Schwab and assets held at Pontera) annually. Client should refer to their Investment Advisory Agreement for the fees they will be charged.

5 in our [Form ADV Part 2A](#).

Your account will be held with a qualified custodian. You will be responsible for the fees and expenses charged by qualified custodians and imposed by broker dealers according to their fee schedules. Those fees and expenses include but are not limited to certain transaction charges, wire transfer and electronic fund fees, and other fees, taxes and costs related to maintaining an account. If your assets are invested in mutual funds, ETFs, or other registered and unregistered investment companies, you will bear your pro rata share of the investment management fees and other fees of the funds, which are in addition to the fees you pay us. These fees and expenses are described in each fund's prospectus or other offering documents. If your assets are held away at Pontera, you will incur an additional charge for their services which is included in your advisory fee. Please refer to your investment advisory agreement for your exact fees. 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 about our fees and costs related to our management of your account, please see Item 5 in our [Form ADV Part 2A](#).

Conversation Starters:

Help me understand how these fees and costs might affect my investments. If I give you \$2,000,000 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:

- * We may recommend that you engage a particular custodian from whom we receive support services. This presents a conflict of interest, because our receipt of their support makes us more inclined to continue using and recommending them.
- * We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we do not currently manage your account held with your employer's plan, this will increase our compensation.

Conversation Starters:

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

For more detailed information about our conflicts of interest, please review Items 4, 8, 11, and 12 of our [Form ADV Part 2A](#).

How do your financial professionals make money?

Certain of our financial professionals may receive commissions from insurance sales to you in their separate and individual capacity. Others are equity owners of the firm, who stand to receive a share of the firm's quarterly income. This presents a conflict of interest as we may recommend you purchase insurance to increase our compensation. We mitigate that conflict by adhering to our fiduciary duty when making recommendations, so that we make recommendations in conformity with each client's investment strategy and objectives. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

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

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals.

Conversation Starters:

As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at (877) 739-6007 ext.103 to request a current copy of our [Form ADV Part 2A](#) or our relationship summary.

Conversation Starters:

Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?