



7th Street
FINANCIAL

Form ADV Part 2A Brochure
March 27, 2025

7th Street Financial
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This Brochure provides information about the qualifications and business practices of 7th St. Financial. If you have any questions about the contents of this Brochure, please contact us at 612-526-9228 or email info@7thstfinancial.com. Currently, our Brochure may be requested free of charge by contacting Jeff Burke, CCO at 612-536-9228 or info@7thstfinancial.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

7th St. Financial is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about 7th St. Financial also is available on the SEC's website at www.adviserinfo.sec.gov.



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Item 2 – Material Changes

This filing is to reflect material changes since the previous amendment filed February 2024

Removed items from list of available

Updated fee structures

- Hourly rate now \$200
- New annual review option



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Item 4 – Advisory Business

7th St. Financial, Inc. is an investment advisor registered with the State of Minnesota and is a corporation formed under the laws of the State of Minnesota.

- The firm is owned by Jeff Burke and has been providing advisory services since 2017.

As of December 31, 2024, 7th St. Financial managed \$6,885,951.03 on a discretionary basis and \$0 on a non-discretionary basis. The firm provides investment advice on an additional \$8,671,236 of investments not under direct management.

7th St Financial is an investment adviser firm that specializes in providing financial planning services. The financial planning services we provide may be comprehensive, specific or modular in their preparation (unique to each client in their depth of preparation). Topics included as part of the financial planning services may include, but is not necessarily limited to, the following:

- Budgeting
- Education planning
- Debt management
- Life events/Major purchase
- Insurance (Risk Management) planning
- Estate planning
- Retirement planning
- Investment planning
- Investment management

We will interview and consult with each client to determine the client's personal financial situation and objectives and to analyze the client's financial documentation. As applicable, we then review the client's assets and liabilities, investment portfolio, retirement plan, education plan, risk management plan, risk tolerance, and estate plan, as well as other areas relevant to the client's financial health. We then provide an executive summary, highlighting the plan of action.

We meet with each client to explain the financial plan and our recommendations. We work with the client throughout the year to implement the plan. The plan is updated as needed to take into account changes in the client's financial situation as well as changes in the investment markets, tax laws, estate planning laws, and other items impacting their financial planning. There will be at minimum a semi-annual review of investments in order to determine if any rebalancing should be recommended prior to the formal semi-annual reviews. The client is ultimately responsible for communicating changes in circumstances to 7th St. Financial so that we can provide the most accurate advice and counsel possible. We are available year round to assist with the implementation of the plan and to answer any client questions, but the client is ultimately responsible for the implementation or rejection of our recommendations. This means you are never obligated or required to implement our recommendations.

Advice provided to clients will be tailored to meet each clients' unique needs and situation. Clients are allowed to place limitations on types of investments or specific securities.



The Adviser is not licensed to sell securities or other products directly to the client. Any advice provided to the client resulting in a recommendation to purchase a security or other product will require the client to purchase that item from a third party. The Adviser may provide recommendations on said third parties.

Investment Management Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

7th St. Financial's investment strategy is not limited to specific types of securities. Our investment strategy is open to recommending a broad range of different investments so long as they are appropriate for the client. These types of investments include, but are not limited to:

- Exchange-listed securities (i.e. stocks, bonds, mutual funds, ETFs)
- Securities traded over-the-counter (i.e. stocks)
- Commodities
- Digital currencies
- Foreign Issues
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States government securities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Options contracts

7th St. Financial does not engage in a wrap fee program.

Investment management services are available using Charles Schwab as a custodian. If a client does choose to use 7th St. Financial investment services with Charles Schwab, prior written authorization from the client in regards to which asset to buy/sell and how much will be obtained prior to the execution of any trade. As a result, 7th St. Financial will not have discretion in client's accounts. As a result, 7th St. Financial does not have discretionary authority over any client assets.



Item 5 – Fees and Compensation

Clients will be charged on a fee-only basis depending on the services elected.

Comprehensive financial planning:

A client may choose to enter into a relationship to be a continual client. The fee structure will be as follows based on the client's assets plus income:

- Minimum annual fee of \$3,000
- Combined income and asset fee scale:
 - \$1,000,000 = \$4,000 annual fee
 - \$1,250,000 = \$5,000 annual fee
 - Annual fee increases \$1,000 for each additional \$250,000 combined income and assets

Comprehensive planning includes the development of an initial financial plan, implementation of any items arising from the plan, ongoing maintenance and at least two formal reviews per year.

Billing is done in arrears on a monthly or quarterly basis. The client may pay the amount due via checking account, credit card, investment account or a combination. Asset values will be determined via the current market value on the day of billing. Quarterly billing cycle is performed on March 1st, June 1st, September 1st, December 1st.

Hourly:

Planning services can be available at an hourly rate of \$200.

This is intended for clients who would either like a one-time financial assessment or do not have the need for full financial planning. This is not intended to replace an ongoing comprehensive planning relationship at a possibly lower hourly fee. The fee may be negotiable, in certain cases, and is due upon completion of the engagement. In the event of early termination by the client, any hours already worked will be due.

Annual Review:

Flat rate of \$1500.

This is intended for clients who might have simpler planning needs or are not looking for comprehensive planning. This requires an initial financial assessment to be completed on an hourly fee arrangement and then an annual refresh. This includes an update meeting to see what has changed from the previous review and a review of updated projections, analysis and recommendations. This option does not include investment management or other communications between updates.

Young Professional Program

The Young Professional Program is designed to offer not only financial planning but also investment management to individuals just starting on their career paths. Our program is designed to help you from



college debt repayment to purchasing your first home, and everything in between. Together we will craft a financial plan and an investment management strategy to give you a solid financial start. Then we are there to help put your plan into action, answer any questions and adjust your plan as needed.

We offer our Young Professionals Program at \$100/per month.

In addition to the fees paid directly to 7th St. Financial, clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Brokerage commissions and/or transaction ticket fees charged by the custodian will be billed directly to the client by the custodian. We do not receive any portion of such brokerage commissions or transaction fees from the custodian or clients. Our fees are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus.

Either party (i.e. the client or our Firm) may terminate the agreement for services with 30 days written notice to the other party. A refund of any unearned fees will be made based on the time expended by 7th St. Financial before termination. A full refund of any fees paid will be made if the agreement is terminated within five business days. When fees are billed in arrears, the client will be responsible for paying the final fee on a pro-rated basis. In the case of hourly financial planning, hours already worked will be due.

Item 12 further describes the factors that 7th St. Financial considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (e.g., commissions).

Item 6 – Performance-Based Fees and Side-By-Side Management

Item 6 of the Form ADV Part 2 instructions is not applicable to this Disclosure Brochure because 7th St. Financial does not charge or accept performance-based fees which can be defined as fees based on a share of capital gains on or capital appreciation of the assets held within a client's account.

Item 7 – Types of Clients

7th St. Financial generally provides investment advice to the following types of clients:

- Individuals
- Pension and profit sharing plans
- Trusts, estates or charitable organizations
- Corporations or business entities other than those listed above

- Foundations, endowments and other institutions

There is no minimum investment amount or client net worth requirement to begin advisory services.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

7th St Financial utilizes two primary methods in analyzing investments.

1. **Fundamental** – This process involves analyzing investments by economic, financial, and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

This method of security analysis is considered to be the opposite of technical analysis. Technical analysis relies looking at buying and selling volume trends as well as tracking the trends of security prices within the market in an attempt to predict moves of the overall market or an individual security.

The primary risk with this method is the subjective nature of the analysis which could be flawed. In addition, while fundamental analysis may support the decision to purchase a given investment it does not guarantee the performance of the investment will reflect that of the analysis.

2. **Cyclical** - Analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

The primary risk of this analysis method is knowing the right time when a market is either at the top or bottom. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after the bottom of the cycle. If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

In general, 7th St. Financial relies more on fundamental analysis. While there are times a cyclical investment recommendation may be made for a given client it is not a regular practice to “time the market”.

Primary Investment Strategies

1. **Long term purchases** – This refers to the intent of purchasing an investment and holding it more than one year. The primary risk of this approach is the potential of holding onto an investment after it has peaked in value. This is the primary method of investment strategy recommended by 7th St. Financial.
2. **Short term purchases** – This refers to the intent of purchasing an investment and holding it less than one year. The primary risk of this approach is the potential of selling a security too soon before it has had time to increase in value. Also, selling a security within a year could result in increased taxes depending on the security and investment vehicle.
3. **Trading** – Buying and selling investments within 30 days.
4. **Short sales** – This practice refers to selling of a stock not owned by the investor. This is done when the investor believes the price of the stock will fall. If the stock falls in value the investor can purchase at the lower price and realize a profit. If the stock goes up the investor must purchase the stock at the higher price and incur a loss. This type of investment would be rarely recommended and then only to more experienced investors.
5. **Margin trading** - When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. This method of investing can increase both gains and losses. The gains are increased as the investor can reap the benefit of all of the gains while only having to pay back the amount borrowed for the transaction. Margin accounts have a minimum amount of equity required however and if the value of the stock falls and results in the investor falling below the required equity the investor will be required to pay additional cash to the brokerage account to make up the difference. This type of investment would rarely be recommended and then only to more experienced investors due to its higher risk.
6. **Options** - Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time. These investments can be used to generate income or be used as a hedge against existing long or short positions. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks. These investments would only be recommended to a more experienced investor.

Risk of Loss

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients should never assume that the future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.



Because of the inherent risk of loss associated with investing, we are unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities.

- **Market Risk** – This is a systemic risk where outside forces help contribute to the overall decline of market values that impacts most securities. The recession of 2008-09 would be an example.
- **Interest Rate Risk** – The risk that changes in interest rates might have on the value of other securities.
- **Inflation Risk** – The risk that overall inflation outpaces the rate of return on fixed return investments such as a CD or bond.
- **Business Risk** – The risk that an investment in a particular company is negatively impacted due to the poor decisions of the management of that specific company. Enron is an example.
- **Liquidity Risk** – The risk that a particular investment cannot quickly be turned into cash based on the investor's needs. An investment in real estate may come with liquidity risk as it may take several months to sell the asset and receive the proceeds.
- **Marketability Risk** – The risk that a given investment may struggle to find a buyer in the timeframe the investor needs. An example would be an investment in fine art. It may take a period of time to find a buyer for the asset.
- **ETF and Mutual Fund Risk** – The client will bear additional expenses based on its pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- **Management Risk** – Your investment using our recommendations will vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of 7th St. Financial or the integrity of 7th St. Financial's management. 7th St. Financial has no information applicable to this Item.



Item 10 – Other Financial Industry Activities and Affiliations

7th St. Financial is an independent investment advisory firm and only provides investment advisory and financial planning services. The firm is not engaged in any other business activities and offers no other services than those described in this Disclosure Brochure.

7th St. Financial is not and does not have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund), (3) futures commission merchant, commodity pool operator, or commodity trading advisor, (4) banking or thrift institution, (5) real estate broker or dealer, or (6) sponsor or syndicator of limited partnerships.

7th St. Financial uses Charles Schwab as its custodian for managing client investments. Clients are not required to use investment management services as part of their engagement. No compensation is received by 7th St. Financial directly or indirectly from Charles Schwab in return for the business that is sent to them.

Our investment advisor representatives are not affiliated (which means registered or employed) with a broker/dealer or commodities and futures trading firm.

7th St. Financial does not provide any other services and is not involved in any other business activities, nor does it have related companies engaged in other activities or have any of the firm’s management personnel work for any related companies.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

7th St. Financial has established a Code of Ethics that applies to all employees of 7th St. Financial and is designed to ensure that high ethical standards are maintained by 7th St. Financial. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. govern personal securities trading activities in the accounts of employees. All supervised persons at 7th St. Financial must acknowledge the terms of the Code of Ethics annually, or as amended.

The Code is based upon the principle that 7th St. Financial and its employees owe a fiduciary duty to 7th St. Financial’s clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. This section is intended



to be a summary of the 7th St. Financial code of ethics. Clients may receive a complete copy of the code of ethics upon request.

Participation or Interest in Client Transactions

7th St. Financial and its associated persons may buy or sell securities that are also recommended to clients. Securities recommended by 7th St. Financial are widely held and publicly traded. In addition, in accordance with its fiduciary duty to clients, 7th St. Financial will place client interests ahead of their own interests. Finally, we have developed policies and procedures under our Code of Ethics that require our employees to submit their personal securities holdings and transactions to our Firm. This is done so that we may monitor their investments to ensure compliance with our Code of Ethics and our general fiduciary duty to clients. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between 7th St. Financial and its clients.

It is 7th St. Financial's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. 7th St. Financial is not a broker-dealer and holds no securities for its own purpose available for trade. 7th St. Financial will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Factors Used to Select Custodians

Advisor does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the “best execution” of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian’s services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian’s:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends Charles Schwab & Co., Inc., a registered broker-dealer, member FINRA and SIPC (“Schwab”). Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with Schwab. We are not affiliated with



Schwab. The Client will ultimately make the final decision of the custodian to be used to hold the Client's investments by signing the selected custodian's account opening documentation.

Research and Other Soft-Dollar Benefits

Advisor does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.
2. Services that may not directly benefit you. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
 - provide access to Client account data (such as duplicate trade confirmations and account statements)



- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
 - provide pricing and other market data
 - facilitate payment of our fees from our Clients' accounts
 - assist with back-office functions, recordkeeping, and Client reporting
3. Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
- Educational conferences and events
 - Consulting on technology, compliance, legal, and business needs
 - Publications and conferences on practice management and business succession
4. Your brokerage and custody costs. For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

Brokerage for Client Referrals

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

Item 13 – Review of Accounts

Account Reviews and Reviewers



7th St. Financial reviews client accounts in their entirety on at least a semi-annual basis to determine if any portfolio rebalancing is needed based on the asset allocation model for each client. In addition, your investment advisor representative will schedule an in-person review of your financial matters on the same semi-annual basis. Clients are encouraged to contact their investment advisor representative at any time if there are events in their life that would predicate a review of their financial matters. In addition, your investment advisor representative, will on a continuous basis monitor the overall economy, market conditions and legislative landscape to determine if clients need to be contacted regarding their financial matters.

Comprehensive financial planning service is available from 7th St. Financial. The financial plan includes a Net Worth Statement, retirement projections, education projections, asset allocation analysis and recommendations, diversification recommendations, a risk tolerance assessment, a risk management review, an estate planning review, as well as additional issues. 7th St. Financial reviews a client's financial situation in detail. Similar to reviews of investment management accounts, your investment advisor representative is the primary person responsible for preparing and updating financial plans, but can seek the assistance of other advisory personnel when needed. You can call, e-mail or schedule in-person meetings with your investment advisor representative as often as needed.

Statements and Reports

7th St Financial will have direct access to your accounts if you have chosen to have us manage the investment account at Charles Schwab. If the account is held somewhere else, we will not have direct access to your accounts to be aware of current balances unless provided through our financial planning software. As a result, reports with current balances and transaction history will be available through a client's other custodians. These account statements should be delivered on a quarterly basis at a minimum. Account statements are delivered at least quarterly. Clients are urged to review the statements for completeness and accuracy.

Item 14 – Client Referrals and Other Compensation

7th St. Financial has no referral compensation agreements for soliciting new clients with any outside party.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody. By this definition, 7th St. Consulting does not have custody over client funds or securities.

Whichever custodian is chosen by the client will be considered to be in custody and will be responsible for sending quarterly statements to the client.

Item 16 – Investment Discretion

Investment discretion refers to the investment adviser having the ability to execute transactions while having the ability to decide one of the following: whether to buy or sell, the asset in the transaction or how much (how many shares of a stock for example or total dollar amount). If the only items the investment adviser can determine is price and timing of the purchase then discretion does not apply. If a client does chose to use 7th St. Financial investment services with Charles Schwab, 7th St. Financial will execute transactions with discretion. Major changes in strategy will be reviewed with a client before trades are executed but smaller moves such as periodic rebalancing will not.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, 7th St. Financial does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. 7th St. Financial may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

This item is not applicable to this brochure. 7th St. Financial, Inc. does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, 7th St. Financial is not required to include a balance sheet for the most recent fiscal year. 7th St. Financial is not subject to a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Finally, 7th St. Financial has not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State-Registered Advisers

7th St. Financial is an investment adviser firm registered with the State of Minnesota. The education and business background for individuals of 7th St. Financials are supplied on the Form ADV Part 2B Brochure Supplement.

7th St. Financial is not involved in any other business other than providing investment advice.

7th St. Financial does not charge any performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Neither 7th St. Financial, nor its management persons have been involved in an arbitration claim or been found liable in a civil, self-regulatory organization or administrative proceeding that is material to the client's evaluation of the Firm or its management.

Neither 7th St. Financial, nor its management persons, has any relationship or arrangement with issuers of securities.





Form ADV Part 2B Brochure

For Jeff Burke
March 27, 2025

7th Street Financial
3027 Sugar Maple Dr.
Chaska, MN 55318
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This Brochure provides information about the following investment adviser representative that supplements the 7th St. Financial brochure. If you have any questions about the contents of this Brochure or did not receive a copy, please contact us at 612-536-9228 or email info@7thstfinancial.com. Currently, our Brochure may be requested free of charge by contacting Jeff Burke, CEO/CCO at 612-526-9228 or info@7thstfinancial.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

7th St. Financial is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about 7th St. Financial also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jeff Burke – CEO/Investment Adviser Representative

Education

- Born 1971
- Bachelor of Accountancy – University of North Dakota 1993
- Certificate of Financial Planning – Terry School of Business, University of Georgia 2017

Business background

- Cargill – Business Analyst, 1995 – 2004
- Cargill – Auditor, 2004-2005
- 7th St. Consulting – Owner, Business Analyst, 2005 – 2011
- Land O’Lakes – Business Analyst, 2011 – 2016
- 7th St Financial – Owner, CEO 2017 – current

Professional Certifications and Designations

- Series 65 – The Uniform Investment Adviser Law exam is a requirement for an individual to be licensed at the state level to provide financial advice for a fee.
- Completed Certified Financial Planning education curriculum – For an individual to obtain the status of being a Certified Financial Planner (CFP) there are three requirements. One is to meet the education standard which this accomplishes. Second is to pass the CFP exam and lastly is to meet an experience requirement of being involved in financial planning for a certain number of years/hours.
- Passed Certified Financial Planning exam.

Item 3 – Disciplinary Action

An investment advisor and its supervised persons (IA Reps) must disclose material facts about any legal or disciplinary event that is material to a client’s evaluation of the advisory business or of the integrity of the IA Rep. The IA Rep does not have any disclosure items.

Item 4 – Other Business Activity

IA representative Jeff Burke is a principal in the management with 7th St Financial but is not involved in any other business activities.

Item 5 – Additional Compensation

An investment advisor and its investment adviser representatives must disclose economic benefits received by non-clients for the provision of advisory services. There are no additional compensation arrangements to disclose for this IA Rep.

Item 6 – Supervision



7th St. Financial has one employee, Jeff Burke. This person will also be responsible for compliance and reviews of portfolios and customer investment objectives.

Item 7 – State Registered Advisers – Disciplinary Action

An investment advisor and its supervised persons (IA Reps) registering at the state level must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of the IA Rep. The IA Rep does not have any disclosure items.