

# TRB Wealth Management, LLC

## Client Brochure

*This Brochure provides information about the qualifications and business practices of TRB Wealth Management, LLC (“TRB”). If you have any questions about the contents of this Brochure, please contact us at 844-221-8595. 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.*

*TRB 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 TRB is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

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March 28th, 2025



## ITEM 2: MATERIAL CHANGES

This item discusses only specific material changes that are made to the Brochure since the Firm's last annual update. It will also reference the date of the last update of the brochure.

Since the Firm's last brochure correspondence to all clients dated August 1<sup>st</sup>, 2024, the following changes were made:

- The firm added the management of Private Funds as an alternative investment option for our clients.
- The Firm introduced an incentive program which may pay incentive compensation to employees of TRB and Texas Regional Bank for referral of new business. This will not impact on the fees clients are charged or the advice given.

Since the Firm's last published update on our website of this brochure dated December 6th, 2024:

- The firm has contracted a new custody relationship with Fidelity Investments and will use them as a second custodian for clients' portfolios to provide further optionality and diversification for its clients.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year, which is December 31. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, TRB's Brochure may be requested by contacting Brian Cafferky by phone at 844-221-8595 or via email at [bcafferky@trb.bank](mailto:bcafferky@trb.bank). Additionally, the Brochure will be available on TRB's website at [www.trb.bank](http://www.trb.bank).



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\* The SEC requires all investment advisers to organize their disclosure documents according to specific categories listed above, some of which may not pertain to TRB’s business. When a required category is not relevant to our business, we list the category and state that it does not apply.



## ITEM 4: ADVISORY BUSINESS

### **A. Firm Description**

TRB Wealth Management, LLC (“TRB” and/or the “Firm”) was organized as a Limited Liability Corporation pursuant to the laws under the Texas Business Organizations Code. TRB is 100% owned by Texas Regional Bank and was formed on April 15, 2020. The Firm is registered with the United States Securities Exchange Commission (“SEC”) and is a notice filer with the various state jurisdictions in which it conducts business as a Registered Investment Adviser.

### **B. Types of Advisory Services**

TRB is a financial services firm that provides investment management services and wealth counsel to individuals, families, trusts, estates, charitable organizations, small business owners, corporate cash management accounts, foundations, endowments, retirement, 401k and profit-sharing plans.

TRB provides its clients with investment management services through which clients receive portfolios of carefully selected investments. The Firm offers clients investment portfolios based on their cash flow situation, tax considerations, tolerance for risk and time horizon. Depending upon the size and goals of each client’s portfolio, the Firm will invest client assets across public and private asset classes.

TRB also offers wealth planning services, which address some or many aspects of the client’s financial situation. TRB works with clients to determine their financial goals and objectives and develops planning strategies for the client to most effectively utilize their financial resources to achieve short and long-term financial objectives. Information the Firm considers includes items such as a client’s current financial status, financial goals, tax bracket, and attitudes towards risk.

TRB does not provide tax advice for our clients. Clients should consult with their accountant or other tax adviser regarding tax filings and/or estimated payments. Additionally, TRB does not provide legal advice or prepare legal documents. However, the Firm works closely with our clients’ estate planning attorneys and other advisers.

TRB offers advisory services on a discretionary and non/discretionary basis. TRB is a fiduciary and is required to act in a client’s best interest at all times.

The Firm currently offers model portfolio investment options as well as bespoke portfolio construction based on a client’s needs. The following model portfolios are available:

- TRB Efficient Models – offered on a graduating scale of 0 - 100 through 100 – 0 (i.e., 10-90, 20-80, 30-70 etc.)
- TRB ETF Models - offered on a graduating scale of 0 - 100 through 100 – 0.



- TRB Core Models - offered on a graduating scale of 0 – 100 through 100 – 0.

The differences between the first number and second number of each model represent the allocation percentages between equity and fixed income allocations.

### **Third Party Strategies**

In exercising its discretion, TRB may utilize third-party investment strategies in constructing portfolios. Under such arrangements, the third-party manager is responsible for security selection and on-going updates in the account at the relevant custodian. All other services are delivered through the Schwab or Fidelity service model.

### **Financial Planning**

At the discretion of the firm, TRB may provide financial planning services as a stand-alone service to clients for which TRB does not have investment management responsibility. Such services will be charged on a fixed fee basis.

### ***C. Client Tailored Services and Client Imposed Restrictions***

The goals and objectives for each client are documented in the Firm's client files. Investment strategies are created that reflect the client's stated goals and objective. Clients may impose reasonable restrictions on investing in certain securities or types of securities. Advisory agreements between the Firm and its clients may not be assigned without prior written client consent.

### ***D. Wrap Fee Programs***

TRB does not sponsor or manage a wrap fee program. TRB participates in a wrap fee program with Schwab and Fidelity as the Firm does not charge the client for trade related fees, such as execution and transaction fees as the Firm pays all trading costs. As a result, the Firm now has and maintains a Wrap Fee brochure which is available in the same manner as this brochure.

### ***E. Amounts of Assets Under Management***

As of 12/31/2024, the Firm has \$1,169,148,483.28 assets under management of which \$1,118,625,507.48 are discretionary and \$50,522,975.80 are non-discretionary.



## ITEM 5: FEES, COMPENSATION AND TERMINATION OF SERVICES

### A. Description of Compensation and Basic Fee Schedule

TRB charges an asset-based advisory fee which is an annualized asset-based fee that will be calculated based on the reporting period ending value (e.g., last business day of the previous month) as referenced in the following table.

For accounts with assets under management up to \$2M:

<b>Assets Under Management</b>	<b>Annualized Asset-Based Fee</b>
\$0 - 500,000	1.35%
\$500,000 - \$1,000,000	1.15%
\$1,000,000 - \$2,000,000	0.95%

For accounts with assets under management above \$2M:

<b>Assets Under Management</b>	<b>Annualized Asset-Based Fee</b>
\$0 - 500,000	0.95%
\$500,000 - \$1,000,000	0.95%
\$1,000,000 - \$2,000,000	0.95%
\$2,000,000 - \$3,000,000	0.80%
\$3,000,000 - \$5,000,000	0.65%
\$5,000,000 – and above	0.50%

Adviser, in its sole discretion, may negotiate to reduce any fee. AUM excludes any non-managed assets held in a managed account when the Firm and the client agree that the Firm will not supervise such non-managed assets. These non-managed assets may include “legacy assets” transferred to the account that the client does not want supervised. The exception to this is for accounts that are invested in a model portfolio where legacy assets are part of the allocation, are managed and supervised, and therefore will be charged. TRB may charge a fee on cash equivalents when such value is part of a managed portfolio being guided by a set investment objective.

The annual fee is prorated and charged monthly, in advance, based upon the market value of the assets being managed by TRB on the last day of the previous billing period. For accounts billed on the Envestnet platform, the fee will be calculated based on the total market value of the assets under management on the last day of the previous month at the applicable fee percentage times the



number of days in the month divided by 365 (or 366 in a leap year) equal the fee charged. For accounts directly billed by TRB, the fee will be calculated based on the total market value of the assets under management on the last day of the previous month at the applicable fee percentage divided by the number of months in the year.

The firm also charges an investment management fee where it is the named investment adviser on a private fund. This fee is charged as a product fee at the fund level and may be additional to the advisory fee charged for portfolio management.

Additionally, for asset management services TRB provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, etc...) TRB may negotiate a fee rate that differs from the range set forth above.

The Firm also bills on 401K plans that they are the adviser for. The plan administrators will generate the fee, who will then invoice the plan. The Firm currently has five plan administrators that operate under these procedures with the fee billing frequency as follows:

<b>Plan Administrator</b>	<b>Payment Cycle</b>
Ascensus	Monthly/ Quarterly
Aspire	Monthly
Ameritas	Quarterly

The payment of the fee is then credited to the Firm via check, ACH, or wire transfer.

### **Financial Planning Fees**

At the discretion of the firm, TRB may provide financial planning services as a stand-alone service to clients for which TRB does not have investment management responsibility. Such services will be charged on a fixed fee basis.

The firm may charge a flat fee or ongoing fee for one-time or ongoing financial planning or consulting services. The total estimated fee, as well as the ultimate fee that we charge will be based on the scope and complexity of the engagement and could vary from fees charged to other clients of the firm. The fee to be assessed and payment arrangements will be detailed in an agreement to be signed by you. Fees for ongoing services will be directly invoiced monthly, quarterly, semi-annually, or annually. Fees charged for financial planning services are variable, depending upon the complexity of the plan requested.



## ***B. Payment of Fees/Direct Fee Debit***

The advisory agreement executed by the client grants TRB the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which TRB retains the authority to directly deduct fees will send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to TRB.

Clients should note that they share in the responsibility to verify the accuracy of fee calculations; the custodian does not verify the accuracy of the fees assessed.

## **Potential Additional Client Fees**

Although the fees earlier described are for advisory fees payable to our firm, there may be additional fees a client may pay when transactions occur in their account. The list of potential fees and expenses below depict what the account holder may pay to engaged service providers, whether the position is being purchased, sold or held in an account.

- Advisory and administrative fees charged by mutual funds and exchange-traded funds (ETFs)
- Advisory fee charged by TRB for private fund investment management.
- Custodial fees
- Wire transfer and electronic fund processing fees
- IRA and qualified retirement plan fees
- Express mailing fees
- Others as disclosed on statements or confirmations when or as required

TRB will charge all clients all fees and charges associated with checks that are returned as non-sufficient funds. This includes, but is not limited to trading charges, market movement which may result in a gain or a loss, and any other custodial/clearing firm charges.

## ***D. Pre-payment of Fees***

Either party may terminate the agreement at any time, which will typically be in writing. If the client verbally notifies our firm of the termination and, if in 30 business days following this notification, the Firm has not received notice in writing, the Firm will accept the account as terminated. Our firm will not be responsible for future allocations or transactional services (except limited closing transactions) upon receipt of a termination notice. It will also be necessary that the Firm inform the custodian of record that the relationship between the firm and the client has been terminated. It is important to note that once your account has begun the account transfer process, it then becomes restricted/frozen at the custodian until the transfer is complete to the institution that you designate the transfer to. This means transactions cannot



be processed within your account. The transfer process can take several weeks. Any fees paid in advance if terminated during the month will be refunded if applicable to the client.

### ***E. Other Compensation***

Neither the Adviser nor its supervised persons accept any compensation/commission for the recommendation of securities or non-securities products including asset-based sales charges or service fees (12b-1 fees, for example) from the sale of mutual funds or insurance products.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

TRB may provide services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets) as it relates to private funds it manages.

## **ITEM 7: TYPES OF CLIENTS**

Our firm provides its advisory services to individual investors, high net worth individuals, trusts, estates, charitable organizations and foundations, financial institutions, pension and profit-sharing plans, and corporations or businesses of various scale. The Firm typically requires a minimum asset level of \$100,000 for an account to be opened, invested and maintained at our firm.

TRB reserves the right to waive certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise to be determined by an officer of the firm. The firm also reserves the right to decline services to any prospective client for any non-discriminatory reason.



## **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### ***A. Methods of Analysis and Investment Strategies***

TRB's investment philosophy and investment approaches utilize active and passive management approaches as well as alternative investment strategies or vehicles. We maintain broad diversification and include domestic, international and emerging market securities in most portfolios. Many of our equity models consist of over 13,000 securities in 44 countries.

TRB recommendations are generally designed as a long-term investment strategy, and clients typically have an investment horizon of at least five to ten years, and often much longer. TRB may, however, adjust its recommendations based upon the needs, objectives or preferences of the client. These adjustments based on a client's specific wishes may result in an asset allocation that is less than optimal relative to long-term needs. Risk tolerance is a component of adviser/client conversations and portfolio construction.

### ***B. Material Risks***

While the Firm believes its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot warrant or guarantee that an investment objective will be achieved. Investing in securities involves risk of loss that a client should be prepared to bear. Some investment decisions made may result in loss, which may include the original principal invested. The Firm have offered examples of such risk in the following paragraphs, and the Firm believes it is important that each prospective investor and/or account holder review and consider each of the risks prior to investing.

### ***C. Certain Risk Factors***

"Investing in securities involves risk of loss that clients should be prepared to bear." All investments carry some amount of risk. TRB's investment strategies may be subject to the following principal investment risks:

**Credit Risks** – The risk that the portfolio could lose money if the issuer of guarantor of a fixed-income security, or the counterparty to a derivative contract, is unable or unwilling to meet its financial obligations.

**Debt Securities Risks** – The issuer of a debt security may fail to pay interest of principal when due, and changes in market interest rates may reduce the value of debt securities or reduce the portfolio's returns.



Emerging-Markets Risk – Foreign investment risks are typically greater for securities in emerging markets, which can be more vulnerable to recessions, currency volatility, inflation and market failure.

Equity Risks – The risk that the value of equity securities, such as common stocks and preferred stocks, may decline due to general market conditions which are not specifically related to a particular company or to factors affecting a particular industry or industries. Equity securities generally have greater price volatility than fixed income securities.

ETF Risks – A portfolio will be exposed indirectly to all of the risks of securities held by an ETF.

Foreign Investment Risk – Foreign investments face the potential of heightened illiquidity, greater price volatility and adverse effects of political, regulatory, tax, currency, economic or other macroeconomic developments.

Liquidity Risk – A security may not be able to be sold at the time desired or without adversely affecting the price.

Market Risk – The market price of securities held by a portfolio may rapidly or unpredictably decline due to factors affecting securities markets generally or particular industries.

Mortgage- and Asset-Backed Securities Risk – These securities may decline in value when defaults on the underlying mortgage or assets occur and may exhibit additional volatility in periods of changing interest rates. When interest rates decline, the prepayment of mortgages or assets underlying such securities may require the reinvestment of money at lower prevailing interest rates, resulting in reduced returns.

Mutual Fund Risk- The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds.

Regulatory Risk – The risk that changes in government regulations may adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

Private Securities Risk – Private securities contain the risks of their respective public securities, but these risks can be magnified due to their illiquidity and lack of public knowledge on the business. These securities are inherently riskier.

Real Estate Risk – The real estate market has experienced some large swings recently. Due to changes in interest rates, the lending market, economic policy, and supply and demand, in addition to illiquidity, real estate investments can carry a great deal of risk.



## **ITEM 9: DISCIPLINARY INFORMATION**

### ***A. Criminal or Civil Action***

Neither TRB, nor any of our employees, has had any civil or criminal actions brought against them.

### ***B. Administrative Procedure***

Neither TRB, nor any of our employees, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

### ***C. Self-Regulatory Organization***

Neither TRB, nor any of our employees, has had any proceedings before a self-regulatory organization, such as the CFP® Board of Standards.



## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### ***A. Registration as a Broker/Dealer or Broker/Dealer Representative***

John Tippit is registered with TRB Capital Markets, LLC, an affiliate of the Firm.

### ***B. Registration as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Adviser***

Neither TRB nor its representatives are registered as an FCM, CPO or a CTA.

### ***C. Registration Relationships Material to This Advisory Business and Conflicts of Interest***

The Firm does not maintain any relationships that would create a material conflict of interest. As the Firm is 100% owned by Texas Regional Bank, these conflicts are mitigated as the Firm does not offer banking products and services.

### ***D. Selection of Other Advisers of Managers and How This Adviser is Compensated for Those Selections***

When the Firm is managing a portfolio, as part of its responsibility as the client's adviser and for the fees it receives in such capacity, it may evaluate and engage sub-advisers to implement certain strategies deemed appropriate for the client. The fees for such sub-advisers are paid directly and are separate from the Firm's advisory fee. Similarly, the Firm will evaluate and select certain funds and other vehicles managed by third parties as part of its responsibility for a portfolio and those vehicles will have independent fees and cost structures borne by the portfolio.



# ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

## ***A. Code of Ethics***

The Firm has adopted a Code of Ethics to manage and address conflicts of interest from personal trading by our IARs and other employees and have established standards of conduct expected of our advisory personnel. We have set forth in the Code of Ethics a statement of general principles, required course of conduct, reporting obligations and review and enforcement of the Code of Ethics. The Firm will provide a copy of the Code of Ethics Policy to our clients or prospective clients upon written request.

## ***B. Investment Recommendations Involving a Material Financial Interest and Conflict of Interest***

Associated persons of the Firm may invest and/or have a financial interest in products and programs that the Firm recommends to clients. This creates a conflict of interest as a client investment in certain investments could result in financial benefits to one or more of the Firm's associated persons. The Firm addresses these potential conflicts of interest by not utilizing these products and programs in discretionary account, by making full disclosure of such relationships to the relevant client(s) prior to making any recommendation and by adhering to written investment policies and strategies in recommending investments.

## ***C. Participation or Interest in Client Transactions / Personal Trading***

IARs of the Firm may buy or sell for themselves securities that they may also recommend to you. These investment products will be bought and sold on the same basis as your managed accounts. In all instances, the Firm believes the positions would be so small that they would have no impact on the pricing or performance of the security. We will do everything possible to mitigate these conflicts and put the interest of our clients first. Records of all IAR's proprietary trading activities are reviewed and maintained by the Firm. The Firm and our IARs will act in a fiduciary manner, understand the prohibitions against the use of any insider information and will always act in your best interest. The Firm has established policies and procedures on compliance with insider trading that are distributed to all associated persons and employees of the Firm. The procedures include provisions for defining "insider" material, monitoring associated persons and employee securities accounts, restricting access to affiliates sensitive material and restrictions on trading.



## **ITEM 12: BROKERAGE PRACTICES**

### ***A. Selecting Brokerage Firms***

#### **1. Research and Other Soft Dollar Benefits**

The Firm does not have any soft dollar agreements.

#### **2. Brokerage for Client Referrals**

Neither the Firm nor our IARs receive client referrals from a broker-dealer or other third party when recommending to you a broker-dealer for the execution of securities transactions.

#### **3. Directed Brokerage**

TRB recommends that clients utilize custody, brokerage and clearing services of Charles Schwab or Fidelity for investment accounts unless it is in the client's best interest to trade away to another broker dealer, including TRB Capital Markets, LLC, an affiliate of the Firm.

### ***B. Aggregation of Securities for Multiple Client Accounts***

The Firm provides investment management services to various clients. The Firm may, in its sole discretion, aggregate purchases or sales of any security, instrument or obligation affected by multiple client accounts. Although such trade aggregations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they will be affected only when the Firm believes that doing so will be in the best interest of the affected accounts. When transactions are aggregated, (a) the actual prices applicable to the aggregated transaction will be averaged, and each client account participating in the aggregated transaction will be deemed to have purchased or sold its share of the security, instrument or obligation involved at that average price and (b) all transaction costs incurred in effecting the aggregated transaction, except to the extent that certain broker-dealers that also furnish custody services may impose minimum transaction charges applicable to some of the participating accounts. When such concurrent aggregation occurs, the objective will be to allocate executions in a manner that is deemed equitable to the accounts involved.



## ITEM 13: REVIEW OF ACCOUNTS

### ***A. Periodic Reviews***

TRB monitors client portfolios on a continuous and ongoing basis. Annual reviews with clients are ongoing and recommended. Such reviews are conducted by TRB investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with the Firm and to keep TRB informed of any changes. TRB investment adviser representatives' endeavor to contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and on an ad hoc, as needed basis to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives

Clients receive account statements directly from their chosen custodian on at least a quarterly basis. These statements can be received as paper copies in the mail or set up to be viewed electronically. Clients should inform TRB immediately if they are not receiving such statements or if they do not contain the amount of assets and positions at the beginning and end of the period, as well as details of all transactions, including fees deducted from the account, during the period.

In addition to the custodial statement, TRB also typically provides clients with performance reports during client meetings or as requested.



# ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

## ***A. Economic Benefits Provided to the Firm from External Sources and Conflicts of Interest***

The Firm does not receive any economic benefits from third parties so there are no conflicts of interest except for the following:

### **Products & Services Available to Us from Schwab (Schwab Adviser Services) and Fidelity (Fidelity Brokerage Services, LLC)**

The two main providers that we use for trading, custody, reporting and related services are Schwab Adviser Services and Fidelity Investments. Many of the services they provide are not typically available to their retail customers. They also make 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. Their support services are generally available on an unsolicited basis and at no charge to us. At Schwab we need to maintain a total of at least \$10 million of our clients' assets in accounts for this. At Fidelity we may have to pay a fee for the AUM on the platform depending on our usage and the level of AUM on the platform.

### **Services that Benefit Client through Schwab and Fidelity**

These firms provide institutional brokerage services including access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products include some to which we might not otherwise have access or that would require significantly higher minimum initial investment by our clients. The services described in this paragraph generally benefit clients or their account(s).

### **Services that May Not Directly Benefit Clients through Schwab and Fidelity**

These providers also make available to us other products and services that benefit us but may not directly benefit the client or their account(s). These products and services assist us in managing and administering our clients' accounts. They include investment research, both their own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained on their platforms. In addition to investment research, they also make available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocate aggregated trade orders for multiple client accounts.



- provides pricing and other market data.
- facilitates payment of our fees from our clients' accounts.
- assists with back-office functions, recordkeeping and client reporting.

They also offer other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting.
- publications and conferences on practice management and business succession.
- access to employee benefits providers, human capital consultants and insurance providers.

They may provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. They may also discount or waive fees for some of these services or pay all or a part of a third party's fees.

Irrespective of direct or indirect benefits to our clients, we strive to enhance the client's experience, help reach their goals and put their interests before that of our firm or its associated persons.

### ***B. Third Party Compensation***

The Firm does not engage in any type of third-party compensation services.

### ***C. Referrals***

In the event a client is introduced to TRB by employees of Texas Regional Bank or employees of TRB, TRB may pay a referral fee in accordance with applicable state securities laws. Any such referral fee is paid solely from TRB investment management fee and does not result in any additional charge to the client and does not impact on the advice given to the client. The Firm does not engage in any type of solicitation arrangements or otherwise.



## **ITEM 15: CUSTODY**

Under applicable regulations, the Firm is deemed to have constructive custody of your assets since you may authorize us to instruct your custodian to deduct our advisory fees directly from your account (details are also available in Item 5-Fees and Compensation) and that the Firm utilizes standing letters of authority (“SLOA”). The Firm obtains written authorization from clients that fees are to be deducted. The Firm also provides a written notice/invoice to the client and custodian detailing the fee calculation and the time frame covering our fee. The Firm does not maintain actual physical custody of your accounts nor is the Firm authorized to hold or receive any stock, bond or other security or investment certificate or cash that is part of your account. Your funds and securities under the Firm’s discretionary management will be maintained at all times with a “qualified custodian” as required under Rule 206(4)-2 under the Investment Adviser Act.

The Firm utilizes Schwab Adviser Services and Fidelity Brokerage Services LLC as its qualified custodians. Account statements are sent directly to clients from their respective custodian. Clients should carefully review those statements and compare them to any reports or statements provided by us.

## **ITEM 16: INVESTMENT DISCRETION**

Each client will execute a Client Services Agreement in which you will grant us sole and absolute discretion in the management of the portion of your portfolio participating in the Firm’s discretionary asset management program as outlined therein except with respect to payment of the Firm’s portfolio management fees. In the exercise of this authority, the Firm is fully authorized and empowered to place orders to brokers, dealers, mutual funds, or other persons with respect to the purchase, sale, exchange, or liquidation of any assets held in your portfolio. For the non-discretionary accounts, the Firm will secure client permission prior to effecting securities transactions for the client in the client’s broker-dealer account(s).

When selecting securities and determining amounts, the Firm observes the investment policies, limitations and restrictions of the clients for which the Firm advises. Investment guidelines and restrictions must be provided to us in writing.



## **ITEM 17: VOTING CLIENT SECURITIES**

The Firm does not take any action or render any advice with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities held in the client accounts. However, the firm has one account that due to a requirement in the client's investment policy statement, states the Investment Adviser handling the account will vote proxies on the accounts behalf, the Firm will vote proxies on that client's behalf.

## **ITEM 18: FINANCIAL INFORMATION**

### ***A. Balance Sheet***

TRB does not require nor solicit prepayment of investment advisory fees which would result in custody issues. Therefore, the Adviser is not required to include a balance sheet with this brochure.

### ***B. Financial Conditions***

Neither TRB nor its management have any financial conditions that are likely to reasonably impair the Adviser's ability to meet contractual commitments to clients.

### ***C. Bankruptcy Petitions***

TRB has not been the subject of a bankruptcy petition in the last ten years.

