



**SWBC Investment Services, LLC**

9311 San Pedro Suite 600 San Antonio, Texas 78216

210.525.1241 800.527.0066 FAX: 210.525.9461

Member of FINRA & SIPC

February 28, 2020

**SWBC Investment Services, LLC's Exemption Report**

SWBC Investment Services, LLC (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. §240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

The Company claimed an exemption from C.F.R. §240.15c3-3 under the provisions of (k)(2)(ii). The Company met the identified exemption provision in 17 C.F.R. §240.15c3-3(k)(2)(ii) from January 1, 2019 through December 31, 2019 except as described on the attached Exhibit A.

I, John P. Tuohy, affirm that, to my best knowledge and belief, this Exemption Report is true and correct.

Respectfully,

A handwritten signature in black ink, appearing to read "John Tuohy", is written over a printed name and title.

John P. Tuohy  
Chief Executive Officer  
SWBC Investment Services, LLC





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**Exhibit A**

On twenty-five (25) occasions listed below, a branch investment representative failed to promptly forward a customer check:

Check received for \$18,500.00 on 01/15/2019 was forwarded on 01/17/2019  
Check received for \$700.00 on 02/01/2019 was forwarded on 02/05/2019 at 5:38 pm  
Check received for \$30,000.00 on 02/26/2019 was forwarded on 02/27/2019 at 12:18pm  
Check received for \$134,035.55 on 03/07/2019 was forwarded on 03/08/2019 at 2:30pm  
Check received for \$1,673.00 on 03/13/2019 was forwarded on 04/08/2019 at 8:46am  
Check received for \$100.00 on 04/01/2019 was forwarded on 04/02/2019 at 3:36pm  
Check received for \$3,352.00 on 04/01/2019 was forwarded on 04/02/2019 at 3:44pm  
Check received for \$110,000.00 on 04/05/2019 was forwarded on 05/06/2019 at 12:00pm  
Check received for \$186,900.00 on 04/23/2019 was forwarded on 04/24/2019 at 12:50pm  
Check received for \$45.00 on 05/23/2019 was forwarded on 05/24/2019  
Check received for \$25,393.44 on 05/29/2019 was forwarded on 06/13/2019 at 5:35pm  
Check received for \$45.00 on 06/27/2019 was forwarded on 07/01/2019 at 12:40pm  
Check received for \$100,000.00 on 07/03/2019 was forwarded on 07/15/2019 at 5:04pm  
Check received for \$40,454.25 on 07/03/2019 was forwarded on 07/15/2019 at 5:05pm  
Check received for \$28,983.78 on 08/28/2019 was forwarded on 08/29/2019 at 2:49pm  
Check received for \$4,000.00 on 09/03/2019 was forwarded on 09/09/2019 at 2:40pm  
Check received for \$53,939.89 on 09/09/2019 was forwarded on 09/13/2019 at 10:28am  
Check received for \$15,000.00 on 09/12/2019 was forwarded on 09/18/2019 at 3:41pm  
Check received for \$30,000.00 on 09/30/2019 was forwarded on 10/01/2019 at 3:07pm  
Check received for \$334.33 on 10/22/2019 was forwarded on 10/23/2019 at 11:19pm  
Check received for \$19,463.38 on 11/12/2019 was forwarded on 11/13/2019 at 4:55pm  
Check received for \$128,528.34 on 11/12/2019 was forwarded on 11/13/2019 at 4:58pm  
Check received for \$32,252.97 on 12/06/2019 was forwarded on 12/09/2019 at 4:33pm  
Check received for \$86.56 on 12/06/2019 was forwarded on 12/09/2019 at 4:36pm  
Check received for \$10,000.00 on 12/12/2019 was forwarded on 01/09/2020 at 7:04pm