



SWBC Investment Company

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Firm Brochure (Form ADV Part 2A)

March 28, 2019

This brochure provides information about the qualifications and business practices of SWBC Investment Company. If you have any questions about the contents of this brochure, please contact us at (800) 527-0066 ext. 17252 and/or invcompliance@swbc.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.

SWBC Investment Company, Inc. is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. Additional information about SWBC Investment Company also is available on the SEC's website at www.adviserinfo.sec.gov.

Summary of Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that all advisors provide to clients as required by SEC Rules. This Brochure, dated 03/31/2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure. We will further provide clients with a new brochure as necessary based on changes or new information, at any time, without charge. Currently, our brochure may be requested by contacting us at (800) 527-0066, ext. 17252.

The following change to our Form ADV, Part 2, since our March 2, 2018 filing:

- Update Officer - Page 15 (September 19, 2018)

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Advisory Business

SWBC Investment Company, Inc. ("Firm") is an SEC Registered Investment Advisory firm. The Firm is a wholly-owned subsidiary of Southwest Business Corporation ("SWBC"), established in 1976. SWBC also owns SWBC Investment Services, LLC, ("Broker Dealer") a member firm of FINRA, and SWBC Investment Advisory Services LLC (an SEC Registered Investment Adviser).

The Firm provides non-discretionary investment advisory services through its Investment Advisor Representatives, "IARs or Advisory Representative", who may be dually registered with SWBC's affiliated Broker Dealer.

The Firm offers services such as those listed below to its Retail clients and described in detail in the section "Retail Advisory Services".

- Non-discretionary investment portfolio management and monitoring services through National Financial Services Corporation's wrap fee programs.
- Asset Management Programs.
- Referrals to appropriate third party money manager programs.
- Financial Planning and Financial Planning Consultation services through certain of its advisory representatives.

In addition, the Firm offers Advisory services to Financial Institutions clients as described in "Institutional Advisory Services" listed in the section below and detailed in section "Institutional Advisory Services.

- Non-discretionary institutional trade execution
- Investment Policy Review
- Portfolio Structuring and Strategy Development
- Investment Portfolio Management, Monitoring and Reporting

SWBC Retail Advisory Services

Asset Management

National Financial Services/ Fidelity offers five wrap fee programs :

- Mutual Fund Wrap Advisory Accounts – Allocates assets across ranges of mutual funds with access to Strategic Advisers, Inc. wrap capabilities.
- Multi-Manager Accounts – Combines multiple investment styles in one account by utilizing asset class managers.
- Separate Account Managers – Assets managed by institutional money managers with a custom tailored investment plan. Services are unbundled separate accounts.
- Representative as Portfolio Manager – Utilizes a set of tools for the Advisory Representative to construct and manage model portfolios.
- Asset Based Advisory Accounts

After establishing a suitable investment portfolio, the advisory representatives monitor client portfolio performance, suggest portfolio modifications to clients, including possible replacements of various managers in the portfolio, on a non-discretionary

basis. The client must give approval for each and every purchase or sale in the portfolio prior to any order placed on the client's behalf with the client's authorization only.

Reviews are conducted periodically but no less than annually using the statements provided by the custodian of the account. Advisory Representatives are required to document this review, no less than annually by completing an annual advisory review form, during such time all agreements and related documents must be reviewed. In principle, the firm's advisory representatives monitor client portfolio performance as a collective group on an ongoing basis.

Financial planning and financial planning consultation services

Financial planning and financial planning consultation services may include any or all of the following areas of interest to an advisory client :

- Asset Allocation
- Business Retirement Planning
- Education Funding
- Estate Planning
- Financial Statements and Portfolio Reports
- Insurance Needs Analysis
- Retirement Planning/Analysis

SWBC Institutional Advisory Services

The Firm provides non-discretionary advisory services for financial institutions clients. Services are tailored to the specific needs of each financial institution, considering but not limited to, its balance sheet, interest rate risk, liquidity, income needs and investment restrictions.

Fees and Compensation

SWBC Retail Advisory Services.

Fees for portfolio recommendations and monitoring are a percentage of the assets under management, assessed quarterly in advance. Advisory fees paid to SWBC Investment Company are separate and distinct from other costs to the client such as brokerage commissions or other, investment-related management fees.

Asset Portfolio Management Fees:

Fees are charged as a percentage of the assets under management as below:

Separately Managed Accounts

| Account size: | Maximum Yearly Fee | Maximum Quarterly Fee |
|------------------------------------|---------------------------|------------------------------|
| <i>\$ 0 to \$ 499,000</i> | <i>2.50%</i> | <i>0 .6250%</i> |
| <i>\$ 500,000 to \$ 999,999</i> | <i>2.25%</i> | <i>0 .5625%</i> |
| <i>\$ 1,000,000 to \$1,999,999</i> | <i>2.00%</i> | <i>0 .5000%</i> |
| <i>\$ 2,000,000 or more</i> | <i>1.85%</i> | <i>0 .4625%</i> |

Multi-manager Accounts

| | | |
|------------------------------|-------|---------|
| \$ 0 to \$ 499,999 | 2.50% | 0.6250% |
| \$ 500,000 to \$ 999,999 | 2.40% | 0.6000% |
| \$ 1,000,000 to \$ 4,999,999 | 2.25% | 0.5625% |
| \$ 5,000,000 or more | 2.00% | 0.5000% |

Wrap Accounts- (UMA, Strategic Advisors, Morningstar Portfolio, EFT Portfolio)

| | | |
|------------------------------|-------|---------|
| \$ 0 to \$ 499,999 | 2.50% | 0.6250% |
| \$ 500,000 to \$ 999,999 | 2.25% | 0.5625% |
| \$ 1,000,000 to \$ 4,999,999 | 2.00% | 0.5000% |
| \$ 5,000,000 or more | 1.85% | 0.4625% |

Representative as Portfolio Manager Accounts (Non-discretionary)

| | | |
|------------------------------|-------|---------|
| \$ 0 to \$ 499,999 | 2.50% | 0.6250% |
| \$ 500,000 to \$ 999,999 | 2.25% | 0.5625% |
| \$ 1,000,000 to \$ 4,999,999 | 2.00% | 0.5000% |
| \$ 5,000,000 or more | 1.85% | 0.4625% |

Asset Based Advisory Accounts

| | | |
|------------------------------|-------|---------|
| \$ 0 to \$ 499,999 | 2.00% | 0.5000% |
| \$ 500,000 to \$ 999,999 | 1.75% | 0.4375% |
| \$ 1,000,000 to \$ 4,999,999 | 1.50% | 0.3750% |
| \$ 5,000,000 or more | 1.25% | 0.3125% |

Fees are payable in advance; fees are negotiable. Fees will be pro-rated initially and in the event of termination of services a pro-rata refund will be allowed.

Third Party money managers

The firm uses over 200 third party money managers to which it may refer clients for investment programs established by those third parties. The firm's advisory representative will help the client select those programs most suitable for the client's stated financial goals within the client's known risk tolerance. Note that, while SWBC Investment Company does not itself exercise discretion over client accounts, many third party money managers do.

Fees for third party money managers are discussed more fully in the agreement for any such referral and that firm's ADV Part II and Schedule F and/or applicable Schedule H for each program. Clients should read carefully those disclosures and take the opportunity to ask any questions they may have regarding all the costs associated with any recommended investment.

Financial Planning Fee Schedule

\$1,000.00 - \$10,000.00 – Full Plan (determined by current plans in place and complexity of estate and assets) - payable at beginning of plan. Plan is to be delivered within to six months from the date the client provides all necessary information.

\$500.00 – minimum for modular plans - fully payable at beginning of plan

\$250.00 - \$5,000.00 – Annual, semi-annual, quarterly, or monthly retainer for financial planning and consultation services

Hourly Planning Fee- \$75.00 – \$250.00 – with 5 hour retainer up front

These services will vary according to the representative and will be specified in a written agreement between the financial planner and the client prior to any services, specifying those services and the agreed-upon fee.

As a part of financial planning, certain advisory representatives can also provide financial and investment advice in areas that are not securities or investments. These include aspects of estate and tax planning, realty / mortgage planning, education planning.

The various portfolio money managers hired by National Financial for its investment model platforms may present different methods of analysis and may use different sources of information in selecting the securities to construct the platform.

SWBC Investment Company's advisory representatives, in turn, review the portfolio structures assembled by those third party managers for suitable application to the stated financial needs and goals of its own clients.

Either party to an advisory agreement for SWBC Investment Company services may terminate that agreement with five (5) days' written notice to the other. A pro-rata refund will be made of any pre-paid fees for termination prior to the end of a period.

Notwithstanding this provision, by law a client may receive a full refund of any pre-paid fees if that client has not received a copy of the advisor's "Disclosure Brochure" (Form ADV Part II and Schedule F and any applicable Schedule H, or the equivalent information) at least 48 hours in advance of signing the agreement.

SWBC Institutional Advisory Services

Fees are calculated on a percentage of the size of the investment portfolio value as either reported by an independent pricing service, reported by the client on its regulatory report (e.g. NCUA 5300 call report or similar report) or as otherwise agreed upon between the adviser and the client. The fees change as the investment portfolio increases and decreases asset size.

SWBC Investment Company's maximum annual fees, based upon the total investment portfolio size under the advisory agreement, are as follows:

| Investment Portfolio Value | Maximum Annual Fee |
|--------------------------------|----------------------------|
| Less than \$25 million | 25.0 basis points (0.250%) |
| \$25,000,001 to \$50,000,000 | 20.0 basis points (0.200%) |
| \$50,000,001 to \$75,000,000 | 18.0 basis points (0.180%) |
| \$75,000,001 to \$100,000,000 | 15.0 basis points (0.150%) |
| \$100,000,001 to \$150,000,000 | 10.0 basis points (0.100%) |
| More than \$150,000,000 | 8.0 basis points (0.080%) |

Fees are negotiable on a case by case basis and may be lower than the maximum limit listed above. The fee negotiated between the adviser and the client will vary based on the value, composition and complexity of the assets under management and specific services provided the client.

Fees will be payable periodically (but no more frequent than monthly) in advance based upon the market value of the Portfolio (valued by an independent pricing service, where available, or by IAR or Advisor in good faith, based on Advisor's books and records) on the last day of the prior reporting period. Client agrees that Advisor may change the fee schedule upon 30 days advance written notice to Client. The fees charged for Services may be deducted from Client's account by a custodian or billed directly to Client. If fees are to be deducted from a custodian account, Client will provide the custodian with written authority to have fees deducted upon notice from IAR or Advisor and paid to Advisor.

Either party to an advisory agreement for SWBC Investment Company services may terminate that agreement with five (5) days' written notice to the other. A pro-rata refund will be made of any pre-paid fees for termination prior to the end of a period.

Advisory fees paid to Advisor are separate and distinct from other costs to Client such as brokerage commissions or other, investment-related management fees. If Client's portfolio includes mutual funds or other investment companies, these shares will be included in calculating the value of Client's Portfolio when Advisor's fees are determined. Client understands that the same assets will also be subject to additional advisory and other fees and expenses, which are described in the prospectuses of those funds, paid by the funds but ultimately borne by Client. The advisory fee may be included within a "Wrap Fee" program that includes the brokerage costs.

Advisor and its representatives shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the Portfolio or any portion thereof.

Performance-Based Fees and Side by Side Comparison

SWBC does not accept performance based fees. Our fees are not based on a share of the capital gains or capital appreciation of managed securities. Performance based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client, which would be a conflict of interest.

Types of Clients

SWBC provides investment advisory services to individuals, trusts, estates, charitable organizations, businesses, pension plans, and institutional clients such as credit unions and banks.

Methods of Analysis, Investment Strategies, and Risk of Loss

Retail Advisory Service

Methods of Analysis

We may use one or more of the following methods of analysis or investment strategies when providing you with investment advice:

- charting analysis,
- fundamental analysis,
- technical analysis, and/or
- cyclical analysis.

Our main source of information for our analysis may include financial newspapers, research materials prepared by others, corporate rating services, timing services, annual reports, prospectus, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

Our investment strategies and advice may vary depending upon your specific needs and situation. Our investment and allocation determinations are based on your stated objectives, risk tolerance, time horizon, financial situation (current and future), liquidity needs, and other factors. Your restrictions and other instructions you give us could impact the composition of your portfolio as well.

The investment strategies we use to implement any investment advice given to clients include long term purchases (securities held at least a year), short term purchases (securities sold within a year), trading (securities sold within 30 days), margin transactions, and option writing (including covered options, uncovered options, or spreading strategies.)

Risk of Loss

SWBC Investment Company, Inc. does not guarantee the future performance of the account or any specific level of performance, the success of any investment decision or strategy that the adviser may use, or the success of the adviser's overall management of the account. The client understands that investment decisions made for the client's account by the adviser are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable. The client understands that investing in any security entails risk of loss.

Institutional Advisory Services

Methods of Analysis

SWBC Investment Company, Inc. provides non-discretionary investment advisory services to clients regarding the investment instruments as permitted by the NCUA's Rules and Regulations Part 703 for federal credit unions and by the U.S. Code, seventh paragraph of 12 USC 24, and by the investment securities regulation of the Comptroller of the Currency (12 CFR 1) for national banks. Investment instruments for state chartered credit unions and banks are governed by the rules and regulations applicable to their respective state and jurisdiction.

Risk of Loss

Investing in securities involve risk by the client that could result in a loss of principal and or a reduction in earnings. SWBC Investment Company advises client portfolios in a manner consistent with their risk tolerance. The adviser does not guarantee the future performance of any client's account, any specific level of performance or the success of investment decision or strategy that we may employ in the management of a client's account.

Disciplinary Information

Registered Investment Advisors (RIA's) are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm. SWBC Investment Company has no information applicable to this item.

Other Financial Industry Activities and Affiliations

Southwest Business Corporation owns SWBC Investment Company, a related broker dealer firm, SWBC Investment Services, LLC and another related Registered Investment Advisory firm, SWBC Advisory Services. Southwest Business Corporation is in turn is owned 50% by Mr. Charles Amato and 50% by Mr. Gary Dudley.

Persons who are dually registered with the related broker-dealer may effect transactions for advisory clients and receive the standard commissions. Clients should be aware that there always exists a possible conflict of interests in any such situation, in which the person making the recommendations or a related person will receive compensation if the client elects to follow those recommendations, as the payment

creates an incentive to make the recommendation. It is an advisor's fiduciary duty first and last to make only those recommendations that are in the client's own best interests.

Advisory representatives may also be licensed to provide information on insurance products, including fixed and variable annuities. In that capacity, those associates will receive the standard insurance commissions, if an advisory client opts to purchase any such insurance product(s). The representatives are able to offer insurance products through related firms of SWBC (Southwest Business Corporation), which offers home owners insurance, automobile insurance and health insurance.

No client is obliged in any way to purchase recommended insurance products nor, if opting to obtain them, to do so through persons associated with SWBC Investment Company.

As noted above, there always exists an inherent risk for a conflict of interests in any such situation in which the advisory representative recommending insurance products or a related person will receive commissions if the client elects to obtain those recommended insurance products.

It is an advisor's fiduciary duty first and last to make only those recommendations that are in the client's own best interests.

Firm associates may invest in securities or securities platform programs that they also recommend to their clients.

In those instances in which there may seem to be a possible conflict of interests, the representative will make known to the client the positions held by a firm associate or the firm itself at the time that such recommendations are made.

Code of Ethics

(Rule 204A-1.)

The firm has established the following Code of Ethics and will provide a copy of this Code, with amendments, to all supervised persons and to any client or prospective client who indicates in writing a desire to obtain a copy.

The firm will document acceptance / acknowledgement of the required code, meaning an intention to abide by Federal Laws and rules regarding the prohibition against the use of insider information and Rule 204A-1.

In order to prevent misuse of material, non-public information, the firm requires

- all persons with access to such information to report their holding and transactions to the firm in writing by means of copies of such market transactions for themselves and their near relatives (parents, siblings and children). The broker dealer used must be SWBC Investment Services, LLC
- supervised persons to report promptly to an officer any violations of the code;
- that an appropriate, designated person be named to maintain and enforce the code,
- review access person's personal securities reports and
- at least an annual review to evaluate the Code's efficacy and applicability.

The firm's identified "Access Persons" are required to report periodically their own personal securities transactions and holdings and those of near relatives, etc.) to the chief compliance officer / or other designated person.

These periodic reports shall include at a minimum a complete report of each Access Person's securities holdings at the time the person becomes an Access Person and at least once a year thereafter. Access persons shall submit quarterly reports of all their personal securities transactions no later than 30 days after the close of the calendar quarter.

Access Persons shall submit holdings and transaction reports for "reportable securities" in which the Access Person has or acquires any direct or indirect beneficial ownership. All Access Persons shall obtain the investment adviser's approval before investing in any IPO or private placement.

In adopting this Code of Ethics, the firm also adopts the standard that requires all employees to live up to a standard of ethical conduct based on principles of openness, integrity, honesty and trust.

Brokerage Practices

SWBC Investment Company, Inc. uses accounts established in the name of our customers with our clearing firm, National Financial Services, to invest assets. We do not charge commissions on transactions placed in accounts that are charged a fee.

"Soft dollars is a rebate or commission for a trade or other financial transaction that is paid with goods or services, rather than cash. SWBC Investment Company does not receive or accept non-cash compensation or "soft dollars."

SWBC Investment Company clears all trades through our clearing firm, National Financial Services. We do not allow "directed" brokerage trades, but rely on National Financial Services for the best execution of our trades. We do not place trades with certain brokers to receive favorable treatment or payment, which could create a conflict of interest.

SWBC Investment Services, LLC, a FINRA registered Broker/Dealer, is affiliated with SWBC Investment Company by way of common ownership and dually registered advisors. Advisors may recommend clients establish brokerage accounts with this broker/dealer to effect non-advisory related brokerage business.

Review of Accounts

Quarterly reviews are made using the statements for client portfolios. Periodically, based on significant market changes or communicated shifts in a client's goals, financial situation, or needs, an in-depth review may be triggered on an ad hoc basis.

The broker(s) and investment company(ies) carrying a client's account(s) send confirmations of each transaction directly to the client. They also provide monthly statements to the client summarizing all activity account, to include: transactions; dividends; funds deposited, transferred, and/or withdrawn; securities receipt and delivery; and all charges and credits. Monthly reports are issued by the account custodian if the account receives interest or has transactions to record. Quarterly account reports and annual statements summarizing portfolio activity are routinely issued.

Client Referrals and Other Compensation

In their capacities as registered representatives of a broker-dealer, persons who are also advisory representatives for the firm may receive the usual 12b-1 fees from Investment Company (Mutual Fund) securities in which an advisory client opts to invest.

Similarly, those advisory representatives who also are licensed to sell insurance products will earn the usual insurance commissions if a client opts to obtain those products, recommended or not, through an associate of SWBC Investment Company.

Advisory clients should be aware that in any such arrangement, in which the same person or that person's employer will be paid if the client opts to follow recommendations regarding such services as brokerage or insurance products, that there always exists the potential for a conflict of interests in that the remuneration available creates an incentive to make the recommendation.

It remains an advisory representative's foremost fiduciary duty to make only those recommendations that are in the client's own best interest.

Custody

Retail Advisory Services

SWBC Investment Company, Inc. uses National Financial Services (NFS) as a primary clearing broker along with Fidelity Brokerage Services. Additional custodians may be selected by the firm from time to time. Customer assets may be held in a brokerage account with NFS or any other custodian as designated by the firm. All custodians are

qualified and they will send you an account statement at least quarterly. You should carefully review account statements when you receive them.

Fees may be charged for assets that the firm does not custody.

Institutional Advisory Services

Custodians are solely selected by the client. The relationship between the client and their selection for safekeeping is maintained by the client outside of the purview of the adviser.

Investment Discretion

SWBC Investment Company advisors may manage client accounts on a discretionary basis, subject to the restrictions (if any) that have been provided by clients. The discretionary managers maintain the required firm paperwork for each discretionary account. This allows the SWBC advisors and money managers to determine the securities to be bought and sold without obtaining client consent to specific transactions. Selection of investments follows the general investment parameters selected for the client as well as any specific instructions associated with each client.

Voting Client Securities

SWBC Investment Company does not have and will not accept authority to vote on our clients behalf. You should receive any proxies or other solicitations directly from the custodian or transfer agent. If we receive this type of information on your behalf, we will promptly forward it to you. If you have any questions regarding a particular solicitation, you can contact our firm at (800) 527-0066 ext 17275.

Financial Information

Under rule 206(4)-4 of the Investment Advisers Act of 1940, investment advisers are required to disclose certain information about their business practices that might serve as material to the client's decision in choosing an investment adviser. As of the date of this filing, SWBC Investment Company does not require the prepayment of any fees six months or more in advance, or maintain financial hardships or other conditions that might impair our ability to meet our contractual obligations to clients.



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John P. Tuohy

President and CEO

SWBC Investment Services, LLC

John P. Tuohy joined SWBC in February 2015 as Managing Director of Investment Services Capital Markets (ISCM) and assumed the position of President and CEO of SWBC Investment Services, LLC in September 2018. He brings over 17 years of sales and trading experience to SWBC. During his time leading the ISCM, he oversaw the creation of a full service Capital Markets Desk and developed SWBC's presence within the fixed income markets, primarily focusing on expanding focused services and solutions to meet the evolving needs of SWBC's clients.

Prior to joining SWBC, John served as SVP, National Sales Leader at Advisors Asset Management, Inc. Earlier in his career at AAM, he served as First Vice President Sales, where he focused on sales and distribution to institutional accounts and independent Registered Investment Advisors. John brings a long tenure of working closely with financial institutions and independent advisors to help provide customized solutions for their clients.

John is a graduate of Providence College with a Bachelor of Science in Business Management. He holds the Series 7, 63, 65, and 24 licenses. He currently resides in San Antonio with his wife and two children.

Member FINRA & SIPC. Advisory services offered through SWBC Investment Company a Registered Investment Advisor.



Jacob D. Palmer

Chief Operating Officer,
SWBC Investment Services, LLC

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Jacob “Jake” Palmer is the Chief Operating Officer and Chief Compliance Officer for SWBC Investment Services, LLC and SWBC Investment Company. Since assuming his current position in 2013, he has overseen all aspects of compliance and operations, as well as the establishment of SWBC’s Investment Services Capital Markets (ISCM) division (fixed income trading).

Jake began his career in the financial services industry in 1992 selling investment products for USAA, a large insurance and financial services company based in San Antonio, Texas. After 10 years at USAA, he spent five years in various sales and management roles with an institutional bond trading company. In 2007, Jake joined the SWBC team as the Chief Compliance Officer. In this role, Jake was responsible for developing and maintaining company-wide compliance programs, policies, and procedures consistent with regulatory policy. Jake has spoken on various panels at national FINRA and SEC conferences and served on many FINRA committees. He is currently a member of the Board of Directors for the Children’s Shelter, and he previously spent three years serving on the Board of Directors of the San Antonio Youth Centers.

Jake graduated from the University of the Incarnate Word with a Bachelors in Business Administration Management. He holds FINRA series 7, 24, 63, and 65 securities licenses.

Member FINRA & SIPC. Advisory services offered through SWBC Investment Company a Registered Investment Advisor.