

# **Form ADV Part 2A: Firm Brochure**

**Carriage Services Investment Advisors, Inc.**

**3040 Post Oak Boulevard Suite 300**

**Houston, Texas 77056**

**Firm Contact**

Neil Verma – Chief Compliance Officer

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This brochure provides information about the qualifications and business practices of Carriage Services Investment Advisors, Inc. (Carriage Services Advisors). Carriage Services Advisors is registered as an Investment Adviser with the United States Securities and Exchange Commission (SEC). Registration with the SEC alone does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (713) 332-8400. The information in this brochure has not been approved or verified by the SEC or by any state securities authority. Additional information about Carriage Services Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Material Changes

There have been no material changes made to this brochure since its last update on March 30, 2018.

## Table of Contents

Material Changes.....	2
Advisory Business.....	3
Fees and Compensation.....	4
No Performance-Based Fees.....	4
Types of Clients We Serve.....	4
Methods of Analysis, Investment Strategies, and Risk of Loss .....	4
Disciplinary Information.....	5
Other Financial Industry Activities and Affiliations .....	5
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	6
Brokerage Practices .....	6
Review of Accounts .....	7
Client Referrals and Other Compensation.....	7
Custody .....	7
Investment Discretion.....	8
Voting Client Securities.....	8
Financial Information.....	9

## Advisory Business

Carriage Services Investment Advisors, Inc. (Carriage Services Advisors) was formed in 2012 as a registered investment adviser (RIA). The firm is a wholly-owned subsidiary of Carriage Services, Inc., a publicly-held company headquartered in Houston, Texas, which is a leading provider of death care services and merchandise in the United States. Those services and merchandise are provided through entities that are directly or indirectly owned and/or controlled by Carriage Services, Inc. As used herein, "CSI" refers to Carriage Services, Inc. and its subsidiaries and affiliates. The business of Carriage Services Advisors is to provide investment advisory and other services to a private fund, Styx Private Fund LLP, a Florida limited liability partnership (the "Fund") and to deathcare trusts of CSI. The Fund is organized for the purpose of pooling funds from certain affiliated deathcare trusts created by CSI and making collective investments of such pooled funds.

The Fund and deathcare trusts contract with Carriage Services Advisors to provide investment advisory services, fund accounting services, fund oversight and investment performance monitoring and other ancillary functions covering investment assets.

The composition of the investments is dependent upon the investment guidelines of the Fund, and in certain circumstances state law mandating investment of the deathcare trusts, and may be comprised of one or more of the following security types:

Equity Securities (exchange listed and OTC, including preferred securities)	Certificates of Deposit/Money Market Instruments
Municipal Securities	Partnerships
Corporate Debt	Publicly Traded Master Limited Partnerships
United States Government Securities	Commercial Paper
Mutual Funds/Exchange Traded Funds	Closed-End Funds

As of December 31, 2018, the Fund and deathcare trust assets managed by Carriage Services Advisors were equal to approximately \$175 million. All such assets are managed on a discretionary basis, whereby Carriage Services Advisors has discretionary authority to engage and terminate sub-advisers, determine the securities to be bought or sold, determine the amount of securities to be bought or sold and select the broker or dealer to be used for the purchase or sale of securities. However, Carriage Services Advisors follows investment guidelines established by Carriage Services, Inc. and the officer of the Fund, Megan Bartels, which set forth investment objectives, permitted investments, target asset allocations,

diversification guidelines, asset quality and other investment standards for the investment of the Fund and deathcare trust assets.

## **Fees and Compensation**

Carriage Services Advisors is customarily compensated on the basis of fees calculated as a percentage of assets under management. Our annual fee is 0.75% of assets under management. All such fees are subject to negotiation from time to time.

Carriage Services Advisors' fees are assessed and payable monthly in advance, based on the value of assets under management at the end of the previous calendar month. In the event that the Fund or deathcare trusts choose to cancel any advisory agreement with us before the end of a billing period, any prepaid fees will be prorated through the end of the period and refunded to the client.

Administrative and recordkeeping expenses associated with our investment advisory services to our clients are generally paid by us out of our fees. Third-party administration fees, custodial fees, brokerage fees and investment management fees are paid directly by our clients (including the Fund). The Fund currently has an Administration Agreement with Regions Bank. Carriage Services Advisors does not receive any fee or commission from the sale of investment products that we recommend to our clients, nor do we participate in wrap fee programs. Managing assets on a fee basis, and performing ancillary services also on a fee basis, is our sole business.

## **No Performance-Based Fees**

Carriage Services Advisors' fees are based on the value of portfolio assets at the end of each calendar month. We do not receive any fees or other compensation based upon the investment performance of accounts.

## **Types of Clients We Serve**

Carriage Services Advisors provides investment management services to pooled investment vehicles (other than registered investment companies), specifically to the Fund, and to deathcare trusts affiliated with CSI.

## **Methods of Analysis, Investment Strategies, and Risk of Loss**

Carriage Services Advisors' management team possesses experience in traditional portfolio management, and may retain sub-advisors with similar expertise. Through Carriage Services Advisors and through sub-advisors (if any), we employ various methods of investment analysis to assist us in formulating investment strategies. Broadly speaking, these methods include fundamental, technical, quantitative and qualitative analysis.

Carriage Services Advisors' primary activities involve the direct management of the assets and supervision of service providers to the Fund and deathcare trusts. The analysis undertaken is primarily based upon investment guidelines, investment manager selection, due diligence into specific investment assets, and performance monitoring.

In sum, our overall investment approach is geared toward generating strong long-term investment returns without assuming undue risk, while ensuring that we manage investment assets in compliance with any applicable state laws. Risk is inherent in any investment program and, as a result, the investment returns on assets will fluctuate and may lose value.

## **Disciplinary Information**

Neither the firm nor any members of the firm's management has ever been the subject of any legal or disciplinary event that would be material to a client's or a prospective client's evaluation of Carriage Services Advisors' business or the integrity of its management.

## **Other Financial Industry Activities and Affiliations**

Carriage Services Advisors is a wholly-owned subsidiary of Carriage Services, Inc., a publicly-held company headquartered in Houston, Texas. Carriage Services, Inc. is a leading provider of deathcare services and merchandise in the United States. Carriage Services Advisors and its management team are not engaged in other financial industry activities, and do not have any relationship with participants in the financial industry that would be considered material. While Carriage Services Advisors may enter into sub-advisory agreements with third parties, Carriage Services Advisors will not receive any direct or indirect compensation from such sub-advisors, and we do not believe such arrangements would create any conflict of interests.

## **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Carriage Services Advisors has adopted a Code of Ethics which applies to all of its management team. A copy of our Code of Ethics is available to any client or prospective client upon request. The Code of Ethics is predicated upon the following principles:

- Carriage Services Advisors and its employees shall always place the interest of our clients ahead of our own interests.
- We shall always be aware of how our actions may look in hindsight, and never take inappropriate advantage of our positions.

The Code of Ethics further provides that all employees must comply with all applicable federal securities laws. It also imposes certain trading restrictions on persons who are likely to know about Carriage Services Advisors' trading activity.

## **Brokerage Practices**

Under our investment advisory agreement with the Fund, we have the ability to select brokers or dealers to execute trades on behalf of the Fund. However, we do not use or recommend brokers or dealers that are related persons. We receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with client securities transactions, provided that all such soft dollar benefits qualify for the safe harbor in Section 28(e) of the Securities Exchange Act of 1934. We do not have specific commission requirements that we must meet in order to continue to receive this research or other services, and we do not receive commission credits which are used toward the purchase of this research or services. We use the research and other products or services for the benefit of all clients, including the Fund. Clients with more trades will therefore bear a disproportionate share of the commission costs associated with receiving these benefits. This creates a conflict of interest where we may have an incentive to select a broker based on receipt of these benefits, instead of the best combination of commission and price. Because of this, when we select brokers that provide these benefits, our clients may pay higher commissions than those charged by some other brokers.

## **Review of Accounts**

Investment, investment manager selections and performance and other service provider selections and performance are reviewed by the Chief Executive Officer. Assets in the funds are reviewed by the Chief Executive Officer on an ongoing basis. All investments under Carriage Services Advisors' management are under diligent supervision.

Detailed written reports, including asset allocation, industry diversification, yield, cost basis, market value, realized gains and losses, income, and transaction activity are provided to our clients quarterly, or as otherwise mutually agreed.

## **Client Referrals and Other Compensation**

Carriage Services Advisors does not have any arrangements with third-party firms where we compensate these firms for referring clients to us or where we receive compensation for referring clients.

## **Custody**

Carriage Services Advisors does not serve as custodian for the Fund or deathcare trust assets. The Fund has retained a third-party custodian, Regions Bank, an Alabama chartered financial institution, to serve this role on their behalf.

The Fund has an annual audit of its financial statements, and such audit is provided to investors in the Fund within 120 days of the end of the Fund's fiscal year. Additionally, the Fund receives account statements from Regions Bank identifying the Fund's assets and transactions in the Fund's account on a monthly basis. The Fund also receives statements from Carriage Services Advisors on a quarterly basis, or as otherwise mutually agreed. We encourage the Fund to compare the account statements received from the custodian with those received from us to ensure that all account transactions are accurate.

Regions Bank and Independence Trust Company serve as the trustee and custodian for deathcare trust assets managed by Carriage Services Advisors, Inc.

## **Investment Discretion**

Pursuant to our investment management agreement with the Fund and the deathcare trusts, all assets are managed on a discretionary basis, whereby Carriage Services Advisors has discretionary authority to engage and terminate sub-advisers, determine the securities to be bought or sold, determine the amount of securities to be bought or sold and select the broker or dealer to be used for the purchase or sale of securities. However, Carriage Services Advisors follows investment guidelines established by Carriage Services, Inc. and the officer of the Fund, Megan Bartels, which set forth investment objectives, permitted investments, target asset allocations, diversification guidelines, asset quality and other investment standards for the investment of assets.

## **Voting Client Securities**

Although Carriage Services Advisors does not currently vote client securities, it has adopted a policy to govern such voting if decides to vote client securities in the future. This policy provides that, as a general matter, Carriage Services Advisors purchases securities based on the belief that the issuer and its management will maximize shareholder value. When we no longer believe management is able to meet this goal, we typically sell the security. Therefore, as to most questions coming before shareholders, we generally vote in accordance with management's recommendations. We anticipate that there will, however, be circumstances when we neither believe disposing of the security is the best course of action nor do we believe that voting in accordance with management's recommendation will be in the best interest of our clients. In those cases, we will vote against management's recommendation. Notwithstanding these general statements, each proxy is voted on a case by case basis. There may even be cases where Carriage Services Advisors determines that the best course of action is to abstain from voting a proxy.

In every case, our guiding principle is to vote each proxy in the best interest of our clients. If a conflict of interest arises regarding the voting of a particular proxy, we will seek to eliminate the conflict if it is feasible to do so. If this is not feasible, we will remove the conflicted individual from the decision-making process or will otherwise resolve any such conflict in the best interest of our clients. We will make a written record of such resolution.

Clients may obtain information on how their proxies were voted by contacting Carriage Services Advisors. We maintain these records for the time periods designated by applicable SEC regulations.



## **Financial Information**

Financial information is only required by firms that engage in certain billing practices (related to requiring advance payments), and Carriage Services Advisors does not engage in these practices. In any event, we are aware of no financial circumstances that would prevent us from meeting our contractual obligations to our clients.