



MERCANTILE INVESTMENT ADVISORS

## **ADV 2**

# **Firm Brochure**

901 Indiana Avenue  
Suite 450  
Wichita Falls, Texas 76301

(940) 723-5565

This brochure provides information about the qualifications and business practices of Mercantile Advisors I, LLC (known also as Mercantile Investment Advisors & Herbert R. Smith & Company) SEC Registrant #165094. If you have any questions concerning the contents of this brochure, please contact us at: (940) 723-5565, or by email at [gabohannon@herbsmith.com](mailto:gabohannon@herbsmith.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.

Additional information about Mercantile Investment Advisors, is available on the [adviserinfo.sec.gov](http://adviserinfo.sec.gov).

Material Changes: Additional owner

## Table of Contents

	Page
Advisory Business	2
Fees and Compensation	2
Types of Clients	3
Methods of Analysis	3
Disciplinary Information	3
Other Industry Activity	3
Code of Ethics	4
Quality of Services	4
Brokerage Practices	4
Products and Services	5
Soft Dollar and Hard Dollar Arrangements	6
Review of Accounts	7
Client Referrals and Other	7
Custody	7
Investment Discretion	8
Voting Client Securities	8
Financial Information	9
ADV II Brochure Supplement	10

Mercantile Advisors, I LLC is a Financial Advisory firm specializing in investment management for individuals, trusts, institutions, and retirement accounts. Offices are maintained in Wichita Falls, Texas.

Mercantile Advisors is registered with the Securities and Exchange Commission under the Investment Advisers Act of 1940. This registration does not in itself denote approval of the company or its practices, but does set forth requirements which must be met to maintain registration. Additionally, we are subject to regulatory audits from the SEC.

Principal Owners: John J. Ford and Gloria Bohannon.

## Advisory Business

Our only business is to provide investment management and services for both individuals and institutions using a combination of equities, fixed-income, exchanged-traded and mutual fund securities and cash allocating these investments based upon our current analyses of economic trends, markets, and investment opportunities. We are not stifled by restrictions as to 'style' or 'sector' investments, but continually assess market opportunities and allocate investments based upon value, growth projections, and income generation.

**Tailored Relationships:** Our investment portfolios speak to the individual needs of each client; their risk profile, income and growth requirements as well as overall objectives. While using many of the same basic securities in most accounts, allocations are adjusted for particular needs such as tax rates, retirement income, and fixed or equity only exposure.

**Agreements:** Clients are provided with an investment management agreement setting out the duties, responsibilities and guidance for both the client and advisor, including our fee structure. It stipulates the advisor's ability to invest funds in security markets and deduct quarterly fees from the account. We do not accept custody of a client's account according to the SEC definition. Charles Schwab is the primary custodian for our clients, although some do choose other custodians. Regardless, necessary cash transfers are initiated by the client and move directly to or from specified financial institution to the investment account without our intervention..

## Fees and Compensation

We are a fee-based only firm. This means we do not participate in sales fees, 12b-1 fees, or commissions of any kind. Clients are billed quarterly in advance on a percentage of assets managed (see schedule below). Accounts may incur third party transaction costs and, in a few cases, custody fees for individual transactions. When using mutual funds, we select 'no-load' or funds which waive the sales fee. Clients do have the option to purchase recommended products through other brokers or agents and their fees would apply. Further information on brokerage is located in the 'Brokerage Practices' section.

Annual Expense ratio —paid quarterly in advance:

1.00% on the first	\$1,000,000
.85% on the next	\$1,000,000
.75% on the next	\$1,000,000
.60% on the next	\$2,000,000
.50% on the next	\$5,000,000

Account minimum \$500,000 – waived under certain circumstances.

## Types of Accounts

Individuals, couples, and families  
Retirement accounts  
IRAs (Conventional, rollover, Roth)  
401(k), 403 (b)  
Profit Sharing Trust  
Public and Private Pension Plans  
Trusts, Family Limited Partnerships, Estates  
Institutions  
Foundations, Charitable Organizations

## METHODS OF ANALYSIS -- Investment Strategies – Risk of Loss

**Analysis:** An overall financial assessment of the client is made in order to structure an asset allocation which matches both the overall return needs and the limitation of risk profile. This assessment is done, if necessary, quantitatively, but also based upon manager experience and client knowledge and an agreed upon level of asset allocation.

**Fundamental:** Securities are identified with the following characteristics:

- Current value as compared to the market and comparable securities
- Current and expected dividend yield
- Country/Industry/market exposure
- Expected return during anticipated holding period

**Technical:** Price and volume charts are utilized to anticipate both purchase and sales timing and to identify securities to review fundamentally. Charts are also utilized to anticipate possible market trends and adjust exposure accordingly while attempting to maintain at least the minimum agreed upon market exposure.

**Risk of Loss:** Most if not all investments are subject to risk of losing principal for various reasons. We attempt to measure the amount of risk associated with both the general market and individual securities or funds. No performance is guaranteed and strategies which were successful in the past may not be successful in the future.

## Disciplinary Information

No disciplinary actions are or have been held against the firm, its management or staff.

## Other Industry Activity

John Ford, CFP™ is a member of the Financial Planning Association, and a member of the DFW chapter of the FPA. John was selected as “One of America’s Top Financial Planners for 2010 through 2015” specializing in Investment Management by the Consumer Research Council of America.

Gloria Bohannon, CRPC is a member of the national FPA and of the local DFW chapter as well as a member of the Board of Commerce, Wichita Falls, Texas.

## Code of Ethics

We are committed to protecting the financial privacy of our clients. A notice is sent annually to our clients in order that we may comply the new privacy regulations of the SEC. As an investment advisor, we maintain a privacy policy to ensure the security and confidentiality of our clients' portfolio information. This Privacy Policy explains what types of information we collect about our clients and how we safeguard the information.

**Personal Trading:** Officers may infrequently invest in the same securities that are purchased for client accounts. Officers will not be involved in any purchases or sales that might be construed as conflicting. Any transaction an officer/employee executes will be after the client or on a completely separate trading day. Our Personal Trading Policy and Code of Ethics are available upon request.

## Brokerage Practices

As stated previously, we do not maintain custody of client assets that we manage or on which we advise. However, we may be deemed to have custody of your assets if you give us authority or direct us to withdraw assets from your account (see Items 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We currently recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as their qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when [we/you] instruct them. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we may use other brokers (third party) to execute trades for your account as described below (see “Your brokerage and custody costs”).

## How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are most advantageous when compared with other available providers and their services. We consider a wide range of factors, including: combination of transaction execution and asset custody services (generally without a separate fee for custody), capability to execute, clear, and settle trades (buy and sell for your account), breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.), and availability of investment research and tools that may assist us in making investment decisions.

### Quality of Services

Competitive pricing (commission rates, margin interest rates, other fees, etc.) and a willingness to negotiate is very important. Of course, reputation, financial strength, and stability, including a history of prior service to us and our clients is fundamental.

Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from “Schwab.”

## Your brokerage and custody costs

For our client accounts that Schwab maintains, they generally do not charge separately for custody but are compensated by charging commissions or other fees on trades executed or settled in your Schwab account.

This commitment benefits clients because overall asset-based fees paid are lower than they would be otherwise. In addition to asset-based fees, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade we execute by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

## Products and Services Available to Us

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its 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 and at no charge to us.

Following is a more detailed description of Schwab’s support services:

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.

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 confirms and 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

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

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors the opportunity to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third parties fees. They may also provide us with other benefits, such as occasional business entertainment of our personnel.

## Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. (These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody.) We may have an incentive to (recommend/request) that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us. The availability of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Soft dollars: We do not use "soft-dollars" for research as defined under Section 28(e). For the general benefit of the majority of clients, we do not use materials provided by Schwab for research, non-research, brokerage, and non-brokerage products and services. Charles Schwab provides our clients with custody services, compliance and regulatory research, and a basic level of security research. In return for these services, which generally benefit all clients, Schwab is used as an institutional broker using competitive institutional brokerage fee schedules. We do pay "hard-dollars" for third party research and Bloomberg LP.

Order aggregation/allocation: Allocations to accounts are based upon current open to buy positions of each client as well as to the need of the portfolio based upon the characteristics of the individual security being allocated. Securities are aggregated when the accounts



have the same underlying need for a particular investment. Allocations are made on a combination of the largest percentage cash position as well as the size limitation of the accounts. The ultimate allocations decision is made by the portfolio manager based upon all factors.

## Review of Accounts

### Periodic Reviews

Daily: MIA will maintain up-to-date portfolios balanced against daily activity

Weekly: Review cash allocations larger than agreed upon.

Monthly: Review overall security allocations

Quarterly: Formalize security allocation exception report to target.

### Review Triggers:

Holding sold, purchased, reduced or added to all core accounts

Allocation review triggers adjustment

Cash review triggers purchases

### Regular reports:

Schwab provides monthly portfolio statements to all clients. We provide quarterly portfolio statements. Schwab also provides annual 1099 tax reporting.

### Pricing Policy:

Most of the valuations for individual securities will come from reliable sources. The majority of pricing will come from data providers through Schwab and downloads into our portfolio management system. Securities which are not priced at month's end will be first priced from sources through Bloomberg LP. Securities not available from Bloomberg LP will be priced based upon a pricing matrix of like securities, maturity and credit quality.

## Client referrals and other compensation

Incoming referrals: We offer discounted fees to current clients who refer new clients –50% of the first quarter's fee is used to reduce the referring client's management fee up to 100% of his quarterly fee.

We receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Brokerage Practices).

## Custody

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account, or if you grant us authority to move your money to a different account registration or another person's account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provide. You should carefully review those statements promptly when



you receive them. We also urge you to compare Schwab's account statements with the periodic portfolio reports you receive from us.

## Investment Discretion

Discretionary trading authority and limited Power of Attorney: We manage securities and portfolios on behalf of our clients. In our advisory agreement clients are asked to allow us to assume discretionary authority over these investment portfolios and the whole investment process.

Clients also give us limited power of attorney (at time of inception) over their investment accounts to execute transactions (buys and sells), to draw out quarterly fees from the account and to vote proxy statements on their behalf. We decline full power of attorney over the accounts in compliance of current SEC custody rules.

## Voting Client Securities

It is possible the investment advisor may encounter a material conflict in voting client proxies. We have a duty to recognize a material conflict and to resolve the conflict before voting the proxy. For purposes of this policy, material conflicts of interest are defined as those conflicts that, in the opinion of the Compliance Officer, a reasonable investor would view as important in making a decision regarding how to vote a proxy.

### A. Examples of material conflicts include:

- (1) Advisor provides investment management services to a company whose management is soliciting proxies; and
- (2) An employee has a business or personal relationship (close friend, spouse or family member) with a member of executive management, a participant in the proxy contest, or a corporate director of the company.

### B. Identifying Conflicts of Interest:

- (1) Advisor maintains a listing of all material business conflicts of interests -those business relationships between the firm and other parties that are deemed to be material and may result in a conflict with respect to a future proxy contest. The firm's Compliance Administrator will maintain the list of material business conflicts.
- (2) All employees are required to disclose all personal and familial relationships that may present a material conflict of interest with respect to a future proxy contest. Employees who are unsure whether a relationship should be disclosed as a material conflict should consult the CCO for guidance.

### C. Resolving Material Conflicts of Interest: Unless a client requests otherwise, we will take one of the following actions to insure the proxy voting decision is based on the client's best interests and is not a result of the conflict.

- (1) Engage an independent party to determine how to vote the proxy;
- (2) Vote in proportion to other shareholders;
- (3) Refer the proxy to a client or to a representative of the client for voting purposes;
- (4) Disclose conflict to the affected clients and seek their consent to vote the proxy prior to casting the vote.

#### D. Cross-trades

From time-to-time the advisor has to sell a particular security and has a client where the security matches a need. The goal of a cross trade is to buy the security at prices below what the market provides and sell at a price higher than available from the market. If there is more than one security to sell, the advisor will sample the bid side of the market to test the spreads and sell side. We send the cross list to one or more of our dealers to provide bids and offering prices for the transaction. Once it has determined that the cross is positive for both parties, we will execute the trades. Pricing is generally a very low cross cost which is generally designated by the broker.

### Financial Information

Since Mercantile Advisors we are not the custodian of any securities or client assets, we do not provide financial statements.

Financial statements for all custodians where securities are held are available upon request.

## ADV II Supplement

John J. Ford, CFP™ -- Owner/Investment Officer – Compliance Officer  
901 Indiana Avenue – Suite 450  
Wichita Falls, Texas 76301  
(817) 831-6133

John resides with his wife Kristin in Burleson, Texas  
Father of 3, Grandfather of 6.

### Educational

B.A. Tarkio College (Missouri)  
Wall Street Journal Scholastic Achievement Award  
MBA University of Arkansas (Fayetteville, Arkansas)  
University of North Texas Financial Planning Executive Classes (1998-2000)  
CFP™ Board certified Financial Planner (2000)

### Experience

Division head: Investment Portfolio Management – NorthPark National Bank, Dallas, Texas  
Institutional Investment Management / Chief Investment Officer – Herbert R. Smith, Inc.  
(1991-2003)

Chief Investment Officer / Mercantile Investment Advisors (2003-Current)

John has no legal or disciplinary events from the SEC or CFP Board of Standards.

John is not actively engaged in other investment related businesses and receives no other compensation. Investment Committee decisions are used to oversee all investment management selections.

Gloria Bohannon – Owner/Vice President

Gloria is responsible for asset allocation and managing client portfolios. She is a Chartered Retirement Counselor and has been a part of our team since 1981.

In 2004, she completed the CFP™ Certification Program at the University of North Texas with total of 92 hours in Financial Planning, Tools & Techniques of Employee Benefits, Fundamentals of Financial Planning, Risk Management & Insurance, Fundamentals of Investing, and Federal Income Taxation. After completing a one year course of study with the College of Financial Planning focused on the retirement planning process. Gloria received the Chartered Retirement Planning Counselor designation in 2009.

Helping to launch two proprietary mutual funds and being responsible for their administration and investments gives Gloria broad-based experience and understanding of mutual funds and equity markets. Working in a fiduciary capacity for individuals, trusts, foundations and institutions, she continues to service our clients well.