

Part 2A of Form ADV
Firm Brochure

**M.E. Allison & Co., Inc.
950 E. Basse Rd., 2nd Floor
San Antonio, TX 78209**

**(210) 930-4000
(210) 930-4001 Fax**

www.meallison.com

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This brochure provides information regarding the qualifications and business practices of M.E. Allison & Co., Inc. (“M.E. Allison”) in its role as a registered investment advisor. If you have any questions about the contents of this brochure, please contact us at 210-930-4000 or lmurphy@meallison.com. The information in this brochure has not been approved or verified by the Securities and Exchange Commission, Texas State Securities Board or other regulatory agency.

Further information regarding our firm is available at the Texas State Securities Board website at <https://www.ssb.texas.gov/securities-professionals/certificate-search> and searching Texas File No. 4111, or by visiting the Securities and Exchange Commission (“SEC”) Investment Adviser Public Disclosure website at adviserinfo.sec.gov and searching the firm’s IARD/CRD No. 1047.

M.E. Allison is registered with the Texas State Securities Board as an Investment Advisor. Registration with the State of Texas – Texas State Securities Board does not imply a certain level of skill or training.

Item 2 - Summary of Material Changes

There have been no material changes in our business.

Currently, our Brochure may be requested by visiting the SEC's website referenced above, contacting M.E. Allison at 210-930-4000, visiting www.meallison.com or emailing lmurphy@meallison.com.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Item 3: Table of Contents

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Item 4 - Advisory Business

M.E. Allison was founded in 1946 as a Broker/Dealer with a primary focus on the Municipal Securities Industry. Over our more than 76-year history our firm has added additional lines of business. M.E. Allison is registered as an Investment Advisor with the Texas State Securities Board since March of 2001. M.E. Allison is organized as a C Corporation. As of September 30, 2024, M.E. Allison & Co., Inc. has \$218,026,083 on the investment advisory platform.

Partnerships with Investment Advisors/Referral Relationship

Since our firm's initial registration as an Investment Advisor, we have focused on working with other independent Investment Advisors to manage our customers' assets. We have relationships that give our customers a number of portfolio management choices, including but not limited to:

Core Equity Strategies
Fixed Income Strategies
Concentrated Holding
Large Cap Growth Strategies

Large Cap Value Strategies
Global All-Cap Core
Equity International Equity
Fixed Income Portfolio (Municipal Bond)

M.E. Allison does not make the portfolio decisions on the above portfolios. The firm works with our customers to help choose the appropriate independent Investment Advisory firm to work with and then helps recommend the portfolio or blend of portfolios for the customer's investment risk tolerance and goals. We work in conjunction with the selected portfolio manager to communicate with the clients to ensure that the general portfolio allocation continues to meet with the clients' goals and to recommend changes when appropriate.

Financial Planning

M.E. Allison & Co., Inc. is available to provide Financial Planning services to our Investment Advisory clients. Christopher Allison is a registered Certified Financial PlannerTM and will customize a financial plan tailored to an individual customer's needs. The Financial Planning process will be different for each individual customer but will generally address meeting the current income needs of clients as well as long term retirement goals. This process may also address Asset Allocation, Business Retirement Planning, Education Funding, Estate Planning, Retirement Planning/Analysis, Financial Statements and Portfolio Reports.

Asset Management/National Financial Services

Through our relationship with National Financial Services ("NFS"), we are able to provide a range of investment advisory services through the FMAX programs and Envestnet. Advisors work with clients to create and establish a suitable investment portfolio, which the advisor will continue to monitor. The advisor may suggest portfolio modification to clients, including possible replacements of various managers in the portfolio.

Reviews are conducted quarterly using the statements provided by the custodian of the account.

Portfolios provided on this model may include:

☐ Separately Managed Accounts (“SMA”)

This account provides access to an actively managed investment portfolio chosen from a roster of independent asset managers (each a “Sub-Manager”) from a variety of disciplines. The separately managed account is a portfolio of individually owned securities that can be tailored to fit the Client’s investing preferences. Clients may also select individual Funds through the SMA program.

☐ Mutual Fund Wrap Advisory Accounts

These asset allocation strategies may consist of a variety of mutual fund and ETF asset managers in the Third-Party Fund Strategists program. Each portfolio may consist solely of mutual funds or ETFs or may combine both types of funds to pursue different investment strategies and asset class exposures.

☐ Multi Manager Accounts

A single portfolio created and managed by FMAX/Envestnet that accesses multiple asset managers and Funds representing various asset classes. FMAX/Envestnet allocates the portfolio across investment asset classes and complementary asset managers to create a blend that fits the Client’s investment profile and risk tolerance.

☐ Representative as Portfolio Manager/ FMAX/Envestnet at Administrator

M.E. Allison Advisors may also have the ability to create their own investment model portfolios for Clients (an “Advisor Directed Model”). On this platform, FMAX/Envestnet may provide administrative services. For certain types of Advisor Directed Models, FMAX/Envestnet will also place trade orders pursuant to the direction of the Advisor.

The Advisor may configure the Advisor Directed Models program so that neither Advisor nor M.E. Allison & Co., Inc. will exercise investment discretion in relation to the Client’s investment model portfolio (a “Non-Discretionary Advisor Directed Models Program”). In a Non-Discretionary Advisor Directed Models Program, the Client has the ability to create his/her own model portfolios. Advisors will review investment model strategies with the Client to determine that the use of a particular investment strategy is appropriate and suitable for the Client. The Client will then approve any subsequent changes to the investment model. The Advisor may also configure the Advisor Directed Models to be discretionary.

Advisor Directed Models/MEA as Administrator

M.E. Allison Advisors have the ability to create their own investment model portfolios for Clients. M.E. Allison & Co., Inc. will provide administrative services and these accounts will be held on the NFS platform.

The Advisor may configure this Directed Brokerage model so that neither Advisor nor M.E. Allison & Co., Inc. will exercise investment discretion in relation to the Client’s investment model portfolio. In a Non-Discretionary Advisor Directed Models Program, the Client has the ability to create his/her own model portfolios. Advisors will review investment model strategies with the Client to determine that the use of a particular investment strategy is appropriate and suitable for the Client. The Client will then approve any subsequent changes to the investment model. The Advisor may configure this Directed Brokerage model to be discretionary.

401K Consulting Services

M.E. Allison advisors may work with companies to create, service, and update 401K plans. These services

may include (1) Review and recommendations of investment options available under plan; (2) Ongoing monitoring of selected investment options for performance, style consistency, management stability and any other factors the advisor considers material; (3) Recommendations of changes or additions/deletions of fund options as needed; (4) Meetings with client as requested by client; (5) Provide employee education on plan investment options as requested by client.

M.E. Allison Directed Strategies

Christopher Allison, C.E.O., has created the following strategies available exclusively to M.E. Allison & Co., Inc. clients. The firm may utilize one of following portfolio models to manage client accounts on a fee only basis. Clients will complete a full suitability review prior to investing in portfolio and accounts will be monitored to insure continued suitability.

Christopher Allison's investment experience spans three decades. Christopher is a CFP as well as an options principal for M.E. Allison & Co., Inc. He has worked with clients on financial planning, investment selection, asset allocation, and ongoing account maintenance.

Sector Weightings Portfolio:

Portfolio is made up of S&P Sectors through low-cost ETF holdings that we believe will outperform due to sector market momentum combined with sectors that we believe to be undervalued.

Sector Weighting Portfolio with options:

Portfolio functions similar to Sector Weightings Portfolio but is supplemented by Call Writing strategies. ETF strategies make call writing a cost-effective way of generating additional portfolio income.

Item 5 - Fees and Compensation

Partnerships with Investment Advisors/Referral Relationship

M.E. Allison & Co., Inc. has agreements with outside independent Investment Advisors to share fees that are paid by our mutual clients. The fee sharing program does not increase the cost above the standard fee schedules of the managing Investment Advisor. A copy of the independent Investment Advisor's Fee schedule and the fee sharing agreement will be provided to all clients by the independent Investment Advisor. Third party money managers will exercise discretion over the client account.

Financial Planning Fees

M.E. Allison & Co., Inc. will work with clients to personalize all financial plans. Advisors may assess Financial Planning fees based on hourly rate, one overall fee, or a combination of the two. Fees are payable in advance. Fees will be pro-rated initially and in the event of termination of services a pro-rata refund will be allowed. This fee schedule is used as a guideline only. All fees are subject to negotiation at the sole discretion of the Advisor.

Asset Management/National Financial Services FMAX

Asset Management Fees for accounts managed through NFS. Fees are charged monthly in arrears.

Separately Managed Accounts: Equity & Blends

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$ 100,000 to \$499,000	1.50%
\$500,000 to \$999,999	1.25%
\$1,000,000 to \$1,999,999	1.00%
\$2,000,000 or more	0.85%

Separately Managed Accounts: Fixed Income & Mutual Funds

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$ 100,000 to \$499,000	1.30%
\$500,000 to \$999,999	1.05%
\$1,000,000 to \$1,999,999	0.80%
\$2,000,000 or more	0.65%

Multi- Manager Accounts

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$150,000 to \$499,000	1.50%
\$500,000 to \$999,999	1.40%
\$1,000,000 to \$4,999,999	1.25%
\$5,000,000 or more	1.00%

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

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$50,000 to \$499,000	1.50%
\$500,000 to \$999,999	1.25%
\$1,000,000 to \$4,999,999	1.00%
\$5,000,000 or more	0.85%

Representative as Portfolio Manager Accounts

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$100,000 to \$499,000	1.50%
\$500,000 to \$999,999	1.25%
\$1,000,000 to \$4,999,999	1.00%
\$5,000,000 or more	0.85%

Advisor Directed Models/MEA as Administrator

Fees are payable in advance. Fees will be pro-rated initially and in the event of termination of services a pro-rata refund will be allowed. This fee schedule is used as a guideline only. All fees are subject to negotiation at the sole discretion of the Advisor.

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$50,000 to \$499,000	1.50%
\$500,000 to \$999,999	1.25%
\$1,000,000 to \$4,999,999	1.00%
\$5,000,000 or more	0.85%

401K Consulting Services

M.E. Allison & Co., Inc. provides advisory services to retirement plans and charges a fee for these services. The fee may be a percentage of assets, or a fixed dollar amount, depending on the client's situation and the type of services being performed. The fee will not exceed 1.5% of the total plan assets. We do not custody assets. Fees will be billed either through the platform that custodies the assets or the plan will be invoiced by M.E. Allison & Co., Inc. Different platforms will have different payment schedules. This information will be clearly delineated and explained in the Investment Advisory Agreement that both Client and Advisor will sign.

M.E. Allison Directed Strategies

Fees are payable in advance. Fees will be pro-rated initially and in the event of termination of services a pro-rata refund will be allowed. This fee schedule is used as a guideline only. All fees are subject to negotiation at the sole discretion of the Advisor.

<i>Account Size</i>	<i>Maximum Yearly Fee</i>
\$500,000 to \$999,999	1.50%
\$1,000,000 to \$4,999,999	1.00%
\$5,000,000 or more	0.85%

Fees paid are separate and distinct from other costs to the client such as brokerage commissions or other, investment related management fees. Advisors will not receive commissions and fees on the same account, but may have a client with both an advisory account and a commission-based account. These accounts will be clearly separated. Advisors will not purchase load mutual funds in any advisory accounts.

Clients who convert to a fee-based account or transfer in assets to a fee-based account may hold mutual funds that pay the firm a trailing commission, called 12b1 fees. Depending on the fund family, we may be able to convert these funds to shares that do not have this payment. Many fund families do not allow this conversion and require a trade between the two share classes, which may cause a taxable event. We will review this process and discuss this with you to insure you are aware of all costs associated with your account and the appropriate share class.

Item 6 - Performance Based Fees

Our firm does not participate in performance-based fees on our clients' accounts.

Item 7 - Types of Clients

We offer our investment advisory service to all clients' accounts that we also serve as a Broker/Dealer. Minimum Account sizes generally depend on the independent Investment Adviser selected to manage the investment portfolio.

- | | |
|---|--|
| <input type="checkbox"/> High Net Worth Individuals | <input type="checkbox"/> Bank Trust Departments |
| <input type="checkbox"/> Trust and Estates | <input type="checkbox"/> Corporations and Partnerships |
| <input type="checkbox"/> Charitable Organizations | <input type="checkbox"/> Individuals |

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Money Manager Accounts

We do not participate in the selection of securities for these investment portfolios.

Firm Managed Accounts

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
- Cyclical Analysis

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 & future), liquidity needs, and other factors. Your restrictions and other instructions you give us could impact the composition of your portfolio as well.

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

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 spread strategies).

Risk of Loss

Investing in securities involves risk of loss (including loss of principal) that each client should be prepared to bear. Typical investment risks include market risk typified by a drop in a security's price due to company specific events (such as an earnings disappointment or a downgrade in the rating of a bond) or general market activity (such as occurs in a "bear" market when stock values fall in general). Stock markets, especially foreign markets, are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Fixed-income strategies are subject to interest rate risk and the inherent credit risk related to the underlying credit worthiness of the various issuers and the volatility of the bond market.

M.E. Allison seeks managers and Funds with a variety of investment strategies in an effort to make a wide range of investment strategies available to Clients. Some strategies may be high-risk strategies. Such strategies usually have the potential for substantial returns; however, there are correspondingly significant risks involved in the strategies. These strategies are not intended for all types of Clients. Clients who choose to follow high-risk strategies should be aware that there is the possibility of significant losses up to and including the possibility of the loss of all assets placed in the strategies. It is strongly recommended that Clients diversify their investments and do not place all of their investments in high-risk investment strategies.

Certain types of investment strategies have particular types of risk. Strategies that invest in international securities involve special additional risks, including currency risk, political risk, and risk associated with varying accounting standards. Investing in emerging markets may accentuate these risks. Strategies that invest in small capitalized companies involve risks, including relatively low trading volumes, a greater degree of change in earnings, and greater short-term volatility. Smaller companies typically have a higher risk of failure, and are not as well established as larger blue-chip companies.

Growth strategies can perform differently from the market as a whole and from other types of stocks and can be more volatile than other types of stocks. High-yield bond strategies invest in lower-rated debt securities (commonly referred to as junk bonds) and involve additional risks because of the lower credit quality of the securities in the portfolio. Clients should be aware of the possible higher level of volatility and increased risk of default.

“Alternative” is an investment type that is not one of the three traditional asset types (stocks, bonds and cash) and generally has low correlations to stocks and bonds. Alternative investments may have complex terms and features that are not easily understood and are not suitable for all investors. Risks that may be associated with liquid alternative investments may include leverage, shorting, security valuation, and nightly reconciliation. Concentrated, non-diversified or sector strategies invest more of their assets in a few holdings and involve additional risks, including share price fluctuations, because of the increased concentration of investments. The lack of industry diversification subjects the Client to increased industry-specific risks. Finally, municipal investment strategies can be affected by adverse tax, legislative or political changes and the financial condition of the issuers of municipal securities.

Item 9 - Disciplinary Information

M.E. Allison has had no legal or disciplinary issues in its role of conducting its Investment Advisory business. Since its founding in 1946, M.E. Allison has incurred three regulatory disclosure events as a broker/dealer. To review all regulatory disclosures for the firm, you can visit FINRA's Broker Check at www.finra.org/brokercheck and search by firm name or CRD#1047.

Item 10 - Other Financial Industry Activities and Affiliations

M.E. Allison is a registered Broker/Dealer conducting general securities business as well as a Financial Advisor that provides underwriting services to Municipal entities.

Persons who are dually registered with our broker/dealer may affect transactions for advisory clients and receive commissions in non-fee-based accounts. 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 foremost to make only those recommendations that are in the client's best interest.

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 usual insurance commissions, if an advisory client opts to purchase any such insurance product(s) from the advisor.

Item 11 - Code of Ethics, Participation or Interest in Client Transaction and Personal Trading

M.E. Allison & Co., Inc. employees or related persons may have accounts with investment managers that M.E. Allison & Co., Inc. recommends to Clients as part of its investment programs. This means that M.E. Allison & Co., Inc. employees or related persons may buy or sell securities that Clients also own in their accounts. Transactions for M.E. Allison & Co., Inc. personnel may not be executed at the same time or in the same manner as those made for Clients.

M.E. Allison & Co., Inc. or a related person of M.E. Allison & Co., Inc. may purchase or sell securities that are recommended to, or purchased, or sold for, Clients. Personal securities transactions by persons associated with M.E. Allison & Co., Inc. are subject to M.E. Allison & Co., Inc.'s Code of Ethics. The Code of Ethics includes various reporting, disclosure and approval requirements, described in summary below. M.E. Allison & Co., Inc. designed these requirements to prevent or mitigate actual or potential conflicts of interest with Clients. The Code of Ethics applies not only to transactions by the individual, but also to transactions for accounts in which such person or the person's spouse, minor children or other dependents residing in the same household have an interest. Compliance with the Code of Ethics is a condition of employment.

M.E. Allison & Co., Inc. requires that all brokerage account relationships be disclosed, that M.E. Allison receive duplicate confirmations of transactions and custodial account statements, and annual certifications of compliance with the Code of Ethics from all access persons. Transactions in U.S. government securities, bankers acceptances, bank certificates of deposit, commercial paper, high quality short-term instruments, including repurchase agreements, index-based futures/options, options/futures on treasury notes and bills or currency options/futures, shares of open-end mutual funds and commodities are excluded from the reporting requirements.

The responsibilities of M.E. Allison & Co., Inc.'s Chief Compliance Officer (or designee) include overseeing the regular monitoring and verification of compliance of covered persons, and reporting material violations to M.E. Allison & Co., Inc.'s senior management. Covered transactions of the Chief Compliance Officer will be approved by another officer (or designee) of M.E. Allison & Co., Inc.. The Chief Compliance Officer may recommend to management the imposition of more severe sanctions, including suspension of personal investing privileges, or termination of employment, in the case of certain types of violations.

Item 12 -Brokerage Practices

Our firm does not have a role in selecting the Broker/Dealer to execute trades initiated by an independent Investment Advisor. The executing Broker/Dealer is generally chosen by the independent Investment Advisor seeking to obtain “best execution” for the clients. Occasionally the client will direct the independent Investment/Advisor to use a particular Broker/Dealer for securities transactions. As a Broker/Dealer our firm may be selected to execute a trade for the independent Investment Advisor. These trades may involve assets of our joint clients or assets of other clients of the independent Investment Advisor.

We may use accounts established in the name of our customers with our clearing firm, National Financial Services, to invest assets. We do not charge a commission on transactions placed in accounts that are charged a fee, however clients may be assessed a transaction cost to cover the execution cost of the trade. This will be disclosed in the client agreement and is similar to costs other brokerage firms may charge to process transactions.

Item 13 - Review of Accounts

Each Investment Advisory Account is reviewed no less than annually by the representative to the account. The third-party investment advisors may be available to meet with clients to review account performance and market conditions. We are always available to answer client questions regarding their account at any time.

For Portfolio Managers on the FMAX/Envestnet Program, a direct consultation with FMAX/Envestnet and Sub- Manager personnel who are knowledgeable about the Client's account and its management will be made reasonably available for consultation. For orderly processing, requests for consultations should be made through Client's Advisor.

For Third-Party Models, with FMAX/Envestnet as overlay manager of the Third-Party Model, FMAX/Envestnet will make personnel who are knowledgeable about the Client's account and its management reasonable available, but FMAX/Envestnet cannot guarantee that the Model Provider will be available for direct Client consultation.

Quarterly account reports and annual statements summarizing portfolio activity are routinely issued. Monthly or quarterly records of the account are issued by the custodian if the account received interest or has transactions to record.

Item 14 - Client Referrals and other Compensation

Our Investment Advisory practice includes Financial Planning, selecting independent Investment Advisors to manage our client's assets, and broker as advisor managed accounts.

For independent Investment Advisors, we receive a percentage of the fee that is paid directly to the independent Investment Advisor. This fee sharing is acknowledged by all clients prior to engaging the independent Investment Advisor.

As discussed in Brokerage Practices we may be selected to execute trades on behalf of the independent Investment Advisor. There is no agreement for our firm being selected to execute trades.

In their capacities as registered representatives of a broker/dealer, persons who are also advisory representatives for the firm may receive 12b-1 fees from investment companies (mutual funds) securities in which an advisory client opts to invest. This will not apply to 401K plan management.

Item 15 - Custody

Under government regulations, M.E. Allison & Co., Inc. is deemed to have custody of a Client's assets if the Client has authorized M.E. Allison & Co., Inc. to instruct its custodian to deduct such Client's advisory fees directly from the Client's account. However, the qualified custodian maintains actual custody of the Client's assets.

Under Advisor Director Models/MEA as Administrator structure, the firm is able to deduct fees from client advisory accounts. Any account opened after 1/1/24 will not be under this model.

Clients should receive at least quarterly statements from the broker dealer, bank, or other qualified custodian that holds and maintains the Client's investment assets. M.E. Allison & Co., Inc. urges Clients to carefully review such statements and compare them to the account statements provided by M.E. Allison & Co., Inc.

Item 16 - Investment Discretion

As a referring Investment Advisor, we do not have discretion over client accounts managed by the independent Investment Advisors. Discretion is generally exercised by the independent Investment Advisor.

For Broker as Portfolio Manager portfolios in the non-discretionary directed brokerage models, we do not have discretion over client accounts. Advisors will review investment strategies with client to determine the use of the particular investment strategy. The client will approve any subsequent changes to the investment model.

Client may open a discretionary advisory account with Adviser (the "Account"). Client authorizes Adviser to buy, sell or otherwise trade securities or other investments in the Account without discussing the transactions with Client in advance. Such securities may include, but are not limited to, common or preferred stock, convertible stocks or bonds, options, warrants, rights, corporate, municipal, or government bonds, and notes or bills. Client also authorizes Adviser to take all necessary action to effect securities transactions for the Account. Adviser shall make investment decisions for the Account according to the investment objectives, risk tolerance, investment time horizon, and any investment policies, guidelines or reasonable restrictions described in the Client's Questionnaire.

Item 17 - Voting of Client Securities

The firm 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 210-930-4000.

Item 18 - Financial Information

Not applicable. 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, our Firm does not require the prepayment of any fees six months or more in advance, nor maintain financial hardships or other conditions that might impair our ability to meet out contractual obligations to the client.