

# THE ADVOCATES

Item 1 – Cover Page

Your Advocates Ltd., LLP

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This Brochure provides information about the qualifications and business practices of Your Advocates Ltd., LLP (“Adviser” or “the Firm” or “The Advocates”). If you have any questions about the contents of this Brochure, please contact us at (713) 827-8014 and/or [anna@youradvocates.com](mailto:anna@youradvocates.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.

YOUR ADVOCATES LTD., LLP is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about YOUR ADVOCATES LTD., LLP also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

2019 Update: There have been no material changes made to The Advocates’ disclosure Brochure since last year’s Annual Amendment filing on March 29, 2018. However, The Advocates, below, has made additions and enhancements at Items 4, 7, 12, 14, and 15 including disclosure regarding use of mutual funds (including DFA funds), retirement rollovers, advisory fees, financial planning limitations, conflicts of interest, and custody. **ANY QUESTIONS: The Advocates’ Chief Compliance Officer, Anna Banks, remains available to address any questions regarding this Part 2A, including the disclosure additions and enhancements.**

Currently, our Brochure may be requested by contacting Anna Banks, Operations and Compliance at (713) 827-8014 or [anna@youradvocates.com](mailto:anna@youradvocates.com) . Our Brochure is also available on our web site [www.youradvocates.com](http://www.youradvocates.com) , also free of charge.

Additional information about YOUR ADVOCATES LTD., LLP is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Your Advocates Ltd., LLP who are registered, or are required to be registered, as investment adviser representatives of Your Advocates Ltd., LLP.

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## Item 4 – Advisory Business

A. The Advocates is a financial planning and investment management firm. The Advocates was formed in January 2006. The Firm provides comprehensive financial planning to individuals primarily for whom it also delivers investment management services. The Advocates will provide financial planning only services apart from investment management services but only on a case-by-case basis; we are very selective in this area. For most individual clients, The Advocates provides investment management services in addition to financial planning services. In these cases, we examine the individual financial planning needs of the client prior to making investment recommendations. The Advocates also manages investment advisory portfolios for those clients who decline full scale financial planning services. However, this is rare and we prefer to provide planning work in addition to investment management because we believe this gives us a better understanding of the client's overall financial picture, their personal goals, risks they may encounter, the risk they need to take (or not take) in their portfolio, etc.

Principal Owners are Paul E. Palmer, Jr., Kurt L. Box and Coleman E. Campbell.

B. The Advocates provides advice in two main areas: financial planning and discretionary investment management.

1. The financial planning services The Advocates provides can be quite broad in scope. The actual services that each individual client receives, however, are contingent upon their particular circumstances and needs. Specifically, the full list of financial planning services we provide includes:

- Cash Flow and Net Worth Statement
- Goal Setting
- Portfolio Analysis
- Retirement Analysis
- Retirement Plan Analysis
- Risk Management Analysis
- Employee Benefits Review & Enrollment
- Deferred Compensation Analysis
- Income Tax Analysis and Planning (Excludes Preparation)
- Charitable Planning
- Estate Planning (Excludes Document Preparation)

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- Education Funding Analysis
  - Social Security Claiming Analysis
  - Business Continuity Planning
2. With respect to our investment advisory services, The Advocates is a diversified, global portfolio manager. We practice integrated asset allocation, and believe that asset allocation – the way a client’s portfolio holdings are divided among stocks, bonds, cash equivalents and other non-correlated asset classes – is a vital determinant of the investment results over both long and short time periods. We do not purchase individual stocks and bonds for our clients but instead use mutual funds and Exchange Traded Funds (ETFs).
- C. The Advocates tailors both our financial planning and investment advisory services to the needs of individual clients. A multitude of personal circumstances are considered and a multitude of documents are needed to prepare this plan. On the investment advisory side, while we do follow a set of 5 “Model Portfolios” for firm scalability purposes, clients’ portfolios are customized as follows:
- Beginning Investment Categories: For tax purposes (personal, taxable/tax-deferred/tax free), limited investment options (i.e. variable annuities, 401ks)
  - Asset class percentage and dollar targets
  - Pie charts detailing current versus proposed allocations by asset class
  - Keep/Sell recommendations of existing holdings
  - Tax consequences of implementation of suggested portfolio
  - Which asset classes to hold in taxable versus tax deferred or tax free accounts
  - Specific investments to buy:
    - According to asset class
    - Identify investment custodian (Schwab Institutional, TD Ameritrade Institutional, other (i.e. no-load variable annuity contract, TIAA CREF, 401k, etc.)
    - Total dollar amounts

As each client approaches us with different circumstances, those circumstances must be taken into account when putting together an optimal portfolio. For example, if a new client has a large gain in a variable annuity, rather than liquidate the annuity we will likely perform a 1035 exchange to a low-cost annuity. Even though the new annuity may have a large amount of available investments, they will not be unlimited. Therefore, we must build the rest of the portfolio under this constraint. After the portfolio is fully invested, The Advocates monitors the portfolio and periodically re-balances the

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portfolio back in line with the original targets. Typically, rebalancing targets are set at + or – 20% of the clients recommended allocation. For example, if the recommended allocation was 20% for a particular asset class, the asset class would be rebalanced back to 20% once it reaches 16% or 24%. Other rebalancing opportunities occur as clients add to or withdraw from accounts.

Clients may impose restrictions on investing in certain securities or types of securities, but the client must inform us in writing before The Advocates will place trades.

D. We do not participate in any “wrap fee” programs.

E. As of 03/7/2019 The Advocates managed \$230,833,793 on a discretionary basis and \$2,420,002 on a non-discretionary basis for 125 clients.

F. MISCELLANEOUS

- **Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** To the extent requested, The Advocates will generally provide planning and consulting services regarding non-investment related matters, such as tax and estate planning, insurance, etc. These services shall generally be inclusive of The Advocates’ advisory fee at Item 5 below. However, there can be exceptions, such that The Advocates will charge separately for such services per the terms and conditions of a separate Financial Planning and Consulting Agreement. **Please Note:** The Advocates does not serve as a law firm or a CPA firm, and no portion of our services should be construed as same. Accordingly, The Advocates **does not** prepare legal documents or tax returns. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.), including The Advocates for insurance products—see disclosure at Item 10 below. The client is under no obligation to engage the services of any such recommended professional, including The Advocates for insurance services. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from The Advocates and/or its representatives. **Please Also Note:** If the client engages any unaffiliated professional (i.e. attorney, accountant, insurance agent, etc.), recommended or otherwise, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and not The Advocates, shall be responsible for the quality and competency of the services provided.

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- **Please Note-Use of Mutual and Exchange Traded Funds:** Most mutual funds and exchange traded funds are available directly to the public. Thus, a prospective client can obtain many of the funds that may be utilized by The Advocates independent of engaging The Advocates as an investment advisor. However, if a prospective client determines to do so, he/she will not receive The Advocates' initial and ongoing investment advisory services.  
**Please Note-Use of DFA Mutual Funds:** The Advocates utilizes mutual funds issued by Dimensional Fund Advisors ("DFA"). DFA funds are generally only available through registered investment advisers approved by DFA. Thus, if the client was to terminate The Advocates' services, and transition to another adviser who has not been approved by DFA to utilize DFA funds, restrictions regarding additional purchases of, or reallocation among other DFA funds, will generally apply. **Please Also Note:** In addition to The Advocates' investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). **ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding the above.**
- **Please Note: Retirement Rollovers-Potential for Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If The Advocates recommends that a client roll over their retirement plan assets into an account to be managed by The Advocates, such a recommendation creates a conflict of interest if The Advocates will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, The Advocates serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. **No client is under any obligation to roll over retirement plan assets to an account managed by The Advocates. The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

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- **Custodian Charges-Additional Fees:** As discussed below at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, The Advocates generally recommends that Schwab and/or TD Ameritrade serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab and TD Ameritrade charge transaction fees for effecting securities transactions. In addition to The Advocates' investment advisory fee referenced in Item 5 below, the client will also incur transaction fees to purchase securities for the client's account (i.e., mutual funds exchange traded funds, etc.)  
**ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding the above.**
- **Private Investment Funds.** If requested by a client, The Advocates will generally provide investment advice regarding private investment funds. The Advocates, on a non-discretionary basis, previously recommended that certain qualified clients consider an investment in private investment funds, including an affiliated private investment fund, SoTex Housing, LP, which is has been closed to new investor for several years, and is in the process of winding down its operations. The Advocates no longer recommend private funds (affiliated or unaffiliated to its clients), although some clients continue to retain a small position in private investment funds. Those assets continue to be included as part of "assets under management" for purposes of The Advocates calculating its investment advisory fee.
  - **Please Note:** Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may own, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund, and acknowledges and accepts the various risk factors that are associated with such an investment.
  - **Please Also Note: Valuation.** In the event that The Advocates references private investment funds owned by the client on any supplemental account reports prepared by The Advocates, the value(s) for all private investment funds owned by the client shall reflect the most recent valuation provided by the fund

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sponsor. However, if subsequent to purchase, the fund has not provided an updated valuation, the valuation shall reflect the initial purchase price. If subsequent to purchase, the fund provides an updated valuation, then the statement will reflect that updated value. The updated value will continue to be reflected on the report until the fund provides a further updated value. **Please Also Note:** As result of the valuation process, if the valuation reflects initial purchase price or an updated value subsequent to purchase price, the current value(s) of an investor's fund holding(s) could be significantly more or less than the value reflected on the report. Unless otherwise indicated, the client's advisory fee shall be based upon the value reflected on the report.

- **Client Retirement Plan Assets.** If requested to do so, The Advocates shall provide investment advisory services relative to the client's 401(k) plan assets. In such event, The Advocates shall allocate (or recommend that the client allocate) the retirement account assets among the investment options available on the 401(k) platform. The Advocates' ability shall be limited to the allocation of the assets among the investment alternatives available through the plan. The Advocates will not receive any communications from the plan sponsor or custodian, and it shall remain the client's exclusive obligation to notify The Advocates of any changes in investment alternatives, restrictions, etc., pertaining to the retirement account.
- **Portfolio Activity.** The Advocates has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, The Advocates will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when The Advocates determines that changes to a client's portfolio are neither necessary nor prudent. Of course, as indicated below, there can be no assurance that investment decisions made by The Advocates will be profitable or equal any specific performance level(s).
- **Client Obligations.** In performing our services, The Advocates shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify us if there is ever any change in his/her/its

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financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

**Please Note: Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by The Advocates) will be profitable or equal any specific performance level(s).

## Item 5 – Fees and Compensation

A. The Advocates generally charges fees in two different ways under two separate contracts.

1. Fees for investment management and financial planning are blended rates. The majority of The Advocates' clients are subject to the following fee schedule:

<u>Assets Under Management</u>	<u>Annualized Fee</u>
First \$500,000	1.20%
\$500,001-\$1,000,000	0.90%
\$1,000,001-\$2,000,000	0.70%
\$2,000,001-\$5,000,000	0.50%
\$5,000,001 - \$10,000,000	0.40%
Over \$10,000,000	Negotiable

As mentioned, these are incremental rates. For example: Exactly \$1,900,000 in assets managed for exactly one year would result in an annual fee of  $\$500,000 \times 1.20\% = \$6,000$  plus  $\$500,000 \times 0.90\% = \$4,250$  plus  $\$900,000 \times 0.70\% = 6,750$  for a total fee of \$16,500 and a rate of 0.868% (\$16,500 fee divided by \$1,900,000 in assets).

Fees are billed quarterly in advance and are subject to change with 30 days written notice. Fees are not negotiable. If a client is charged a fee less than The Advocates' standard fee schedule, it is normally expressed as a professional courtesy discount on client's annual Fee Schedule (this is applicable to the firm's family members only).

- a. Minimum Fee: Clients engaging The Advocates are subject to a minimum fee of \$5,000.
2. A small number of The Advocates' clients are under different arrangements for ongoing financial planning and investment management services. The terms of those arrangements are

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governed by a signed Investment Advisory Agreement that is executed with the individual client at the time of engagement.

- B. The specific manner in which investment advisory fees are charged by The Advocates is established in a client's written agreement with The Advocates. The Advocates bills its fees on a quarterly basis. Clients are billed in advance each calendar quarter and fees are deducted from client accounts. Clients may have the option to pay these fees outside of this arrangement.
- C. The Advocates' investment advisory fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to The Advocates' fee, and The Advocates shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that The Advocates considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

- D. Clients must pay fees in quarterly in advance. Management fees shall be prorated for each capital contribution and withdrawal over \$10,000 made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged or refunded a prorated fee. When a client terminates an account or accounts, the client will be entitled to a pro rata refund of any pre-paid quarterly fee based upon the number of days remaining in the quarter after termination. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.
- E. The Advocates does not accept or receive any compensation for the sale of securities or other investment products.
- F. The Advocates, in its sole discretion, may charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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## Item 6 – Performance-Based Fees and Side-By-Side Management

The Advocates does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## Item 7 – Types of Clients

The Advocates Services provides portfolio management services to individuals and high net worth individuals. The majority of our clients are high net worth individuals. The Advocates, in its sole discretion, may charge a lesser investment advisory fee and/or charge a flat fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, competition, negotiations with client, etc.). Please Note: As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. Please Also Note: In the event that client is subject to the \$5,000 annual minimum fee, the client could pay a higher percentage advisory fee than the 1.00% referenced in the above fee schedule. ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding advisory fees.

## Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

- A. The Advocates is a diversified, global investment manager. We practice integrated asset allocation, and believe that asset allocation – the way a client's portfolio holdings are divided among stocks, bonds, cash equivalents and other non-correlated asset classes – is a vital determinant of the investment results over both long and short time periods. While we are not “market timers” in that we do not jump in and out of equities and other asset classes over short periods of time (i.e. less than one year), we do vary exposure to the asset classes we utilize over time. These variations are first and foremost dependent upon each particular client's need for and ability to take risk. Secondly, exposure to the asset classes is based on our evaluation of the overall valuation level of the asset class. We do not purchase individual stocks and bonds for our clients but instead use mutual funds and Exchange Traded Funds (ETFs). The Advocates currently uses up to 11 major asset classes per the following categorizations:

- Cash
- Short Term Bond
- Bank Loan
- Core Bond
- Managed Futures

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Gold

Emerging Market Bonds

Large Capitalization U.S. Stock

Small/Mid Capitalization U.S. Stock

Foreign Stocks (Large Capitalization, Developed Markets)

Diversified Emerging Market Stock

- B. Please note that investing in securities involves risk of loss that clients should be prepared to bear. All of the investments and asset classes utilized by The Advocates fluctuate in value and thus there is a chance client may lose money over both the short term and the long term. While our clients' portfolios have generally had a lower risk of both incurring losses and in the magnitude of those losses than has the US stock market in general, no assurances can be made that this will always hold true or that it will be true moving forward.
- C. The Advocates primarily recommends mutual funds and Exchange Traded Funds (ETFs). Secondly, we also utilize subaccounts within commission free variable annuities and limited partnerships for clients who are accredited investors (financial assets of \$1 million and over).

Mutual Fund and ETF Risks: The mutual funds and ETFs utilized by The Advocates involve certain material risks. More about these risks can be found in fund and ETF prospectuses. These risks are namely:

- General Risks: All investments are subject to inherent risks, and investments and the funds and ETFs utilized by The Advocates are no exception. Accordingly, you may lose money by investing in the funds and ETFs recommended by The Advocates. These funds and ETFs may be worth less than what you paid for them when you sell them because their prices will fluctuate day-to-day, reflecting changes in market conditions, interest rates and numerous other factors.
- Market Risks: Markets can trade in random or cyclical price patterns, and prices can fall over sustained periods of time. The value of the mutual funds and ETFs utilized by The Advocates may fluctuate as markets fluctuate and could decline over short- or long-term periods.
- Focused Portfolio and Non-Diversification Risks: Some of the funds and ETFs utilized by The Advocates may have more volatility and are considered to have more risk than a fund that invests in a greater number of securities because changes in the value of a single security may have a more significant effect, either negative or positive, on net asset value ("NAV").

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- **Special Situation Risk:** Some of the funds and ETFs utilized by The Advocates may make investments in special situations which may involve greater risks when compared to other strategies due to a variety of factors.
- **Interest Rate Risk:** Some of the funds and ETFs utilized by The Advocates may make investments that are subject to interest rate risk, which is the risk that the value of a security will decline because of a change in general interest rates. Investments subject to interest rate risk will usually decrease in value when interest rates rise and rise in value when interest rates decline. Also, securities with long maturities typically experience a more pronounced change in value when interest rates change.
- **Credit Risk:** The mutual funds and ETFs utilized by The Advocates make investments that subject to credit risk. An issuer's credit quality depends on its ability to pay interest on and repay its debt and other obligations. Defaulted securities (or those expected to default) are subject to additional risks in that the securities may become subject to a plan or reorganization that can diminish or eliminate their value. The credit risk of a security may also depend on the credit quality of any bank or financial institution that provides credit enhancement for the security.
- **High Yield Security Risk:** The mutual funds and ETFs utilized by The Advocates may make investments in fixed-income securities that are rated below investment grade by one or more nationally recognized statistical rating organization ("NRSROs") or that are unrated and are deemed to be of similar quality ("high yield securities"). These securities may be subject to greater risk of loss of principal and interest than investments in higher-rated fixed-income securities. High yield securities are also generally considered to be subject to greater market risk than higher-rated securities.
- **REITs Risk:** Some of the mutual funds utilized by The Advocates may invest in real estate investment trusts (REITs). REITs may be subject to certain risks associated with the direct ownership of real property, including declines in the value of real estate, risks related to general and local economic conditions, overbuilding and increased competition, increases in property taxes and operating expenses and variations in rental income.
- **Bank Debt Risk:** Some of the mutual funds utilized by The Advocates, particularly the one utilized to fill the Bank Loan asset class, make investments in bank debt. Investments in bank debt involve credit risk, interest rate risk, liquidity risk and other risks, including the risk that any loan collateral may become impaired or that the purchasing fund may obtain less than the full value for the loan interests when sold.

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- **Small to Medium Capitalization Risk:** Some of the mutual funds and ETFs utilized by The Advocates may have the ability to invest in securities of companies with small to medium market capitalizations. Such companies may be engaged in business within a narrow geographic region, be less well known to the investment community and have more volatile share prices. Also, companies with smaller market capitalizations often lack management depth and have narrower market penetrations, less diverse product lines and fewer resources than larger companies. Moreover, the securities of such companies often have less market liquidity and, as a result, their stock prices often react more strongly to changes in the marketplace.
- **Emerging Markets Risk:** The mutual funds and ETFs we utilize in the Emerging Market Bond and Emerging Market stock asset classes also involve the additional risks associated with investing in these areas. Risks include geo-political, regulatory and currency risk (see below for currency risk).
- **Currency Risk:** The mutual funds and ETFs we utilize primarily in the Emerging Market Bond, Foreign Bond and Emerging Market Stock asset classes also face the risk that that foreign currencies will decline in value relative to the U.S. dollar and affect the fund's or ETF's investments in foreign (non-U.S.) currencies.

Many of the above risks also apply to limited partnerships we use, but they also contain one additional risk; that is liquidity risk. In the case of these limited partnerships, the liquidity risk is due to the illiquid nature of the underlying investments in the limited partnerships. This means that limited partners cannot typically sell or redeem their securities except in the case of death or disability.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of The Advocates or the integrity of The Advocates' management. The Advocates has no information applicable to this Item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

- A. Registered investment advisers are required to disclose all facts regarding other financial industry activities and affiliations they may have. The Advocates is not and does not have any management persons who are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

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- B. Neither The Advocates nor any of our management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C. The Advocates is licensed as an insurance agency and in this capacity acts as a broker for term and permanent life insurance, fixed rate annuities, disability insurance and long-term care insurance. This service is only available to our financial planning and investment advisory clients. Each of these types of policies are risk management tools and may be appropriate and suitable for some clients. Since The Advocates has found that sending the client to another company to purchase the above insurance does not typically result in a discount, The Advocates offers to serve as the client's representative and broker of record in the purchase. The commissions are always fully disclosed to the client and it is only at the request of our clients that we represent them as an insurance broker in the insurance marketplace. Additionally, the client is informed that they can always use an outside broker for their insurance purchases. The insurance activities comprise less than 5% of our business activities.
- D. Neither The Advocates nor any of our management persons receive compensation directly or indirectly from other advisers.
- E. Conflict of Interest: As indicated above, representatives of The Advocates, in their separate individual capacities, serve as licensed insurance agents. Please Note-Conflict of Interest: The recommendation by The Advocates representative that a client purchase an insurance commission product from The Advocates in its separate capacity as an insurance agency, presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from The Advocates. Clients are reminded that they may purchase insurance products recommended by The Advocates through non-affiliated insurance agents. The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

## Item 11 – Code of Ethics

- A. The Advocates has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the

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acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at The Advocates must acknowledge the terms of the Code of Ethics annually, or as amended.

- B. The Advocates does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest. It is The Advocates' policy that the firm will not affect any principal or agency cross securities transactions for client accounts.
- C. The Advocates anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which The Advocates has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which The Advocates, its affiliates and/or clients, directly or indirectly, have a position of interest. The Advocates' employees and persons associated with The Advocates the firm are required to follow our Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of The Advocates and its affiliates MAY trade for their own accounts in securities which are recommended to and/or purchased for The Advocates' clients. The Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of the employees of The Advocates Services will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. In practice, however, virtually all trades are overseen by the firm's Chief Compliance Officer, Anna Banks, and are only trades that occur in the normal course of rebalancing employee's accounts to their particular model. Additionally, each quarter, employee trades are downloaded and reviewed.
- D. Employees who trade on the same day as clients must have all trades aggregated with client orders and receive the average pricing. Since The Advocates does not utilize individual stocks or bonds, only mutual funds and ETFs, this applies only to ETFs. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between The Advocates Services and its clients.

# THE ADVOCATES

The Advocates' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Anna Banks.

## Item 12 – Brokerage Practices

- A. In the event that the client requests that The Advocates recommend a broker-dealer/custodian for execution and/or custodial services, The Advocates generally recommends that investment advisory accounts be maintained at Schwab and/or TD Ameritrade. Prior to engaging The Advocates to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with The Advocates setting forth the terms and conditions under which The Advocates shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.
- B. Factors that The Advocates considers in recommending Schwab and/or TD Ameritrade (or any other broker-dealer/custodian to clients) include historical relationship with The Advocates, financial strength, reputation, execution capabilities, pricing, research, and service. Although the transaction fees paid by The Advocates' clients shall comply with The Advocates' duty to obtain best execution, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where The Advocates determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although The Advocates will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions. The transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, The Advocates' investment advisory fee.
- C. **Non-Soft Dollar Research and Benefits:** Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, The Advocates can receive from Schwab and/or TD Ameritrade (or another broker-dealer/custodian, investment manager, platform sponsor, mutual fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist The Advocates to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by The Advocates can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services,

# THE ADVOCATES

discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by The Advocates in furtherance of its investment advisory business operations.

- D. The Advocates' clients do not pay more for investment transactions effected and/or assets maintained at Schwab and/or TD Ameritrade as a result of these arrangements. There is no corresponding commitment made by The Advocates to Schwab or TD Ameritrade, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangements.

**ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.**

- E. **Directed Brokerage.** The Advocates recommends that its clients utilize the brokerage and custodial services provided by Schwab and/or TD Ameritrade. The Firm generally does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Firm will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by The Advocates. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Please Note: In the event that the client directs The Advocates to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through The Advocates. Higher transaction costs adversely impact account performance. Please Also Note: Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.
- F. **Order Aggregation.** Transactions for each client account generally will be effected independently, unless Firm decides to purchase or sell the same securities for several clients at approximately the same time. Firm may (but is not obligated to) combine or "bunch" such orders to obtain best

# THE ADVOCATES

execution, to negotiate more favorable commission rates or to allocate equitably among Firm's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Firm shall not receive any additional compensation or remuneration as a result of such aggregation.

## Item 13 – Review of Accounts

Every client relationship is assigned a primary and secondary advisor. A client's primary advisor reviews all client portfolios at regular intervals and compares each clients' overall portfolio with the respective model portfolio assigned to the client to ensure the portfolio is: (i) suitable to the respective client's investment objectives; (ii) meets that client's quality standards; and (iii) to make sure that their investment objectives are still pertinent to the managed account arrangement. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, client deposits and withdrawals or the market economic or political environment. The Advocates' monitoring process includes a daily review of all transactions affecting each account. On a daily basis, all accounts are reconciled by electronic means between The Advocates' portfolio accounting/management system and the brokers of record of The Advocates' clients (primarily Schwab and TD Ameritrade). Other trigger points include a review of called or maturing securities or other notable events (e.g. material change in a client's financial or personal circumstances). Client account information, transactions, holdings and statements are available on demand through the custodian's website, and in addition on a quarterly basis, The Advocates provides comprehensive reporting to each client. Clients are encouraged to view these statements and compare them to reports produced by The Advocates' portfolio management system. Periodic meetings or teleconferences with each client are typically conducted to review the portfolio status and to reaffirm the basic premises behind the client's allocation. Additionally, The Advocates uses a risk assessment tool called Finametrica. The Advocates attempt to have all clients take the assessment every 3 years to help determine any changes in their risk profile. Finally, we also utilize a sophisticated trading and rebalancing software (Tamarac Rebalancer) that allows us to easily see which clients' portfolios are out of tolerance with their set model portfolio, when they have excess cash and when cash needs to be raised.

# THE ADVOCATES

## Item 14 – Client Referrals and Other Compensation

- A. As indicated at Item 12 above, The Advocates can receive from Schwab and/or TD Ameritrade without cost (and/or at a discount), support services and/or products. The Advocates' clients do not pay more for investment transactions effected and/or assets maintained at Schwab (or any other institution) as result of this arrangement. There is no corresponding commitment made by The Advocates to Schwab and/or TD Ameritrade, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.
- B. The Advocates does not maintain solicitor arrangements. The Advocates continues to compensate one former solicitor for prior client introductions.

## Item 15 – Custody

- A. The Advocates shall have the ability to deduct its advisory fee from the client's custodial account. Clients are provided with written transaction confirmation notices, and a written summary account statement directly from the custodian (i.e., Schwab, TD Ameritrade, etc.) at least quarterly. Please Note: To the extent that The Advocates provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by The Advocates with the account statements received from the account custodian. Please Also Note: The account custodian does not verify the accuracy of The Advocates' advisory fee calculation.
- B. In addition, some clients have provided The Advocates with passwords to their retirement and/or other accounts that are not maintained at Schwab or TD Ameritrade. These arrangements result in the Registrant having custody, and are disclosed at Item 9 of Part 1 of Form ADV. The affected accounts are subject to an annual surprise CPA examination. **ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions that a client or prospective client may have regarding custody-related issues.**

# THE ADVOCATES

## Item 16 – Investment Discretion

The Advocates always receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Further, at the inception of a new client relationship, The Advocates always details the names and dollar amounts of the securities that will be initially purchased by in the client's account(s); getting the client's verbal approval at a presentation meeting before moving forward with any trading. We obtain trading, disbursement and fee payment authorization in conjunction with client account openings. When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions of the clients for which we advise.

## Item 17 – Voting *Client* Securities

As a matter of firm policy and practice, The Advocates does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive their proxies and other solicitations directly from their custodian or a transfer agent, not from us. If a client wishes to discuss a proxy, they may call or email us to ask us our advice regarding voting the proxy.

## Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about The Advocates' financial condition. We have no financial commitments that impair our ability to meet contractual and fiduciary commitments to clients, and have not been the subject of a bankruptcy proceeding.

**ANY QUESTIONS: The Advocates' Chief Compliance Officer, Anna Banks, remains available to address any questions regarding this Part 2A.**



Item 1- Cover Page

Your Advocates Ltd., LLP

DBA “The Advocates”

Form ADV Part 2B – Individual Disclosure Brochure

for

Paul Edwin Palmer, Jr.

Your Advocates Ltd., LLP

DBA “The Advocates”

920 Memorial City Way Ste. 250, Houston, TX 77024

Phone: 713 827-8014

Website: [www.youradvocates.com](http://www.youradvocates.com)

Email: [paul@youradvocates.com](mailto:paul@youradvocates.com)

March 29, 2019

This Brochure Supplement provides information about Paul Edwin Palmer, Jr. that supplements the Your Advocates Ltd., LLP Brochure. You should have received a copy of that Brochure. Please contact Anna Banks if you did not receive Your Advocates’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Paul Palmer, Jr. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

Paul E. Palmer, Jr. - Born 1958

### Education Background:

Graduated with a BS degree in Business Administration from Louisiana State University in 1980. Mr. Palmer also earned his Certified Financial Planner (CFP®) designation in 1986 and the Chartered Life Underwriter (CLU®) designation in 1996 and is a graduate of the College for Financial Planning's CFP Certification Education Program.

### Additional Information on Professional Designations:

- **CFP:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

# THE ADVOCATES

- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

- **CLU:** To receive the CLU® designation, you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

## Business Background:

10/2005 – Present: Your Advocates Ltd., LLP, Principal

10/2005 – Present: Cypress Advisory Management, Inc., President

10/1993 – 10/2005 – Cypress Advisory Services, a sole proprietorship, President/Owner

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

## Item 4- Other Business Activities

As detailed in The Advocates’ ADV Part II A Item 10C, Your Advocates Ltd., LLP Ltd., LLP is licensed as an insurance agency with Paul E. Palmer and Coleman E. Campbell as agents holding their Texas General Lines insurance license. In this capacity The Advocates acts as a broker for term and permanent life insurance,

# THE ADVOCATES

disability insurance, fixed rate annuities, and long-term care insurance. These insurance products are risk management tools and may be appropriate and suitable for many clients. Since The Advocates has found that sending the client to another company to purchase the above insurance does not typically result in a discount, The Advocates offers to serve as the client's representative and broker of record in the purchase. The commissions are always fully disclosed to the client and it is only at the request of our clients that we represent them as an insurance broker in the insurance marketplace. Additionally, the client is informed that they can always use an outside broker for their insurance purchases. The insurance activities comprise less than 5% of our business activities. As such, associated persons of The Advocates are licensed insurance brokers and sell insurance products (i.e. term life, disability, and long-term care) to the clients of The Advocates.

## Item 5- Additional Compensation

Paul Palmer, Jr. does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

## Item 6 - Supervision

Paul Palmer, Jr. serves in multiple capacities for The Advocates including:

- Principal and Limited Partner
- Business development
- Client financial plan preparation
- Client insurance analysis
- Client estate planning

We recognize that the lack of segregation of duties may potentially create conflicts of interest, however, our policies and procedures ensure timely and accurate recordkeeping and supervision, and all client financial plans and major portfolio shifts (i.e. not portfolio rebalancing) are jointly reviewed with all business partners prior to implementation. Paul Palmer, Jr., Kurt Box and Cole Campbell are the only partners at Your Advocates Ltd., LLP and as such, are responsible for supervision of all business and advisory activities.

## Item 7- Requirements for State-Registered Advisers

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Paul Palmer, Jr. is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.



Item 1- Cover Page

Your Advocates Ltd., LLP

DBA “The Advocates”

Form ADV Part 2B – Individual Disclosure Brochure

for

Kurt Louis Box

Your Advocates Ltd., LLP

DBA “The Advocates”

920 Memorial City Way Ste. 250, Houston, TX 77024

Phone: 713 827-8014

Website: [www.youradvocates.com](http://www.youradvocates.com)

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March 29, 2019

This Brochure Supplement provides information about Kurt Box that supplements the Your Advocates., LLP Brochure. You should have received a copy of that Brochure. Please contact Anna Banks if you did not receive Your Advocates’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Kurt Box is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

Kurt Louis Box - Born 1976

### Education Background:

Graduated Magna Cum Laude with a BS degree in Accounting from Texas A&M University and Master's of Science (MS) in Finance from Texas A&M University. Mr. Box has also earned his Certified Financial Planner (CFP®) designation, the Accredited Investor Advisor (AIF) designation and is a graduate of the College For Financial Planning's CFP Certification Education Program.

### Additional Information on Professional Designations:

- **CFP:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

# THE ADVOCATES

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

- **AIF:** The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

## Business Background:

10/2005 - Present: Your Advocates Ltd., LLP, Principal

04/2003 - 10/2005 - Cypress Advisory Services, Principal

01/2001 - 04/2003 - Sanders Morris Harris, Investment Banking Analyst

06/2000 - 12/2001 - Tenfold Corporation, Software Developer

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4- Other Business Activities

As detailed in The Advocates’ ADV Part II A Item 10C, Your Advocates, Ltd., LLP is licensed as an insurance agency with Paul E. Palmer and Coleman E. Campbell as agents holding their Texas General Lines insurance

# THE ADVOCATES

license. In this capacity The Advocates acts as a broker for term and permanent life insurance, disability insurance, fixed rate annuities, and long-term care insurance. These insurance products are risk management tools and may be appropriate and suitable for many clients. Since The Advocates has found that sending the client to another company to purchase the above insurance does not typically result in a discount, The Advocates offers to serve as the client's representative and broker of record in the purchase. The commissions are always fully disclosed to the client and it is only at the request of our clients that we represent them as an insurance broker in the insurance marketplace. Additionally, the client is informed that they can always use an outside broker for their insurance purchases. The insurance activities comprise less than 5% of our business activities. As such, associated persons of The Advocates are licensed insurance brokers and sell insurance products (i.e. term life, disability, and long-term care) to the clients of The Advocates.

## Item 5- Additional Compensation

Kurt Box does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

## Item 6 - Supervision

Kurt Box serves in multiple capacities for The Advocates including:

- Principal and Limited Partner
- Internal accounting
- Client financial plan preparation
- Client portfolio management and trading
- Client tax planning (not preparation)

We recognize that the lack of segregation of duties may potentially create conflicts of interest. However, our policies and procedures ensure timely and accurate recordkeeping and supervision, and all client financial plans and major portfolio shifts (i.e. not portfolio rebalancing) are discussed with and reviewed by another The Advocates partner prior to implementation. Paul Palmer, Jr., Kurt Box and Cole Campbell are the only partners at Your Advocates Ltd., LLP and as such, are responsible for supervision of all business and advisory activities.



Item 1- Cover Page

Your Advocates Ltd., LLP

DBA “The Advocates”

Form ADV Part 2B – Individual Disclosure Brochure

for

Coleman Edward Campbell

Your Advocates Ltd., LLP

DBA “The Advocates”

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March 29, 2019

This Brochure Supplement provides information about Coleman Edward Campbell that supplements the Your Advocates Ltd., LLP Brochure. You should have received a copy of that Brochure. Please contact Anna Banks if you did not receive The Advocates’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Coleman Edward Campbell is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

# THE ADVOCATES

## Item 2- Educational Background and Business Experience

Coleman E. Campbell - Born 1969

### Education Background:

Attended Sam Houston State University in Business Administration, did not graduate. Mr. Campbell also earned his Certified Financial Planner (CFP®) designation and the Chartered Life Underwriter (CLU®) designation.

### Additional Information on Professional Designations:

- **CFP:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

# THE ADVOCATES

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

- **CLU:** To receive the CLU® designation, you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

Business Background:

05/2012 – Present: Your Advocates Ltd., LLP, Principal

09/1996–05/2012: Capstone Wealth Group an office of MetLife, Senior Financial Planner

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

## Item 4- Other Business Activities

As detailed in The Advocates’ ADV Part II A Item 10C, Your Advocates Ltd., LLP is licensed as an insurance agency with Paul E. Palmer and Coleman E. Campbell as agents holding their Texas General Lines insurance license. In this capacity The Advocates acts as a broker for term and permanent life insurance, disability insurance, fixed rate annuities, and long-term care insurance. These insurance products are risk management tools and may be appropriate and suitable for many clients. Since The Advocates has found that sending the client to another company to purchase the above insurance does not typically result in a discount, The Advocates offers to serve as the client’s representative and broker of record in the purchase.

# THE ADVOCATES

The commissions are always fully disclosed to the client and it is only at the request of our clients that we represent them as an insurance broker in the insurance marketplace. Additionally, the client is informed that they can always use an outside broker for their insurance purchases. The insurance activities comprise less than 5% of our business activities. As such, associated persons of The Advocates are licensed insurance brokers and sell insurance products (i.e. term life, disability, and long-term care) to the clients of The Advocates.

## **Item 5- Additional Compensation**

Mr. Campbell does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

## **Item 6 - Supervision**

Coleman Campbell serves in multiple capacities for The Advocates including:

- Principal and Limited Partner
- Business development
- Client financial plan preparation
- Client insurance analysis
- Client estate planning

We recognize that the lack of segregation of duties may potentially create conflicts of interest, however, our policies and procedures ensure timely and accurate recordkeeping and supervision, and all client financial plans and major portfolio shifts (i.e. not portfolio rebalancing) are jointly reviewed with all business partners prior to implementation. Paul Palmer, Jr., Kurt Box and Cole Campbell are the only partners at Your Advocates Ltd., LLP and as such, are responsible for supervision of all business and advisory activities.

## **Item 7- Requirements for State-Registered Advisers**

State registered investment adviser representatives are required to disclose all material facts regarding certain legal, disciplinary or financial events that would be material to the evaluation of the representative. Coleman Campbell is currently not subject to, nor has ever been subject to, any legal, disciplinary or financial events of this nature.



Item 1- Cover Page

## Form ADV Part 2B – Individual Disclosure Brochure

for

Adam Glenn Frinsco

Your Advocates Ltd., LLP

DBA “The Advocates”

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March 29, 2019

This Brochure Supplement provides information about Adam Frinsco that supplements the Your Advocates Ltd., LLP Brochure. You should have received a copy of that Brochure. Please contact Anna Banks if you did not receive The Advocates’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Adam Frinsco is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

# THE ADVOCATES

## Item 2- Educational Background and Business Experience

Adam Glenn Frinsco - Born 1984

### Education Background:

Graduated with a Bachelor of Arts (BA) degree in Communication Studies and a minor in Psychology from Texas Tech University, and a Master's of Science (MS) in Personal Financial Planning from Texas Tech University. Mr. Frinsco also attended New York University's branch campus in Prague, CZ to study International Accounting abroad. Mr. Frinsco has earned his Certified Financial Planner (CFP®) designation, and is a Chartered Market Technician (CMT®).

### Additional Information on Professional Designations:

- **CFP:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

# THE ADVOCATES

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- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## Business Background:

10/2013 – Present – Your Advocates Ltd., LLP, Financial Planner

01/2010 – 10/2013 – Sequent Asset Management, Financial Advisor

05/2008 – 08/2008 – Kanaly Trust Co., Financial Planning Intern

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

## Item 4- Other Business Activities

Adam Frinsco has no other business activities to disclose at this time.

## Item 5- Additional Compensation

Adam Frinsco does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

## Item 6 – Supervision

# **THE ADVOCATES**

The three principles of Your Advocates Ltd., LLP, Paul Palmer, Cole Campbell, and Kurt Box are responsible for supervising Mr. Frinsco. They may be contacted at (713) 827-8014.