

# FORM ADV PART 2A DISCLOSURE BROCHURE

May 1, 2019

## Inscription Family Office, LLC

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*This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Inscription Family Office, LLC ("Inscription Family" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (832) 802-6761.*

*Inscription Family is a registered investment advisor with U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Inscription Family to assist you in determining whether to retain the Advisor.*

*Additional information about Inscription Family and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 301900.*

## MATERIAL CHANGES

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### ANNUAL UPDATE

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Inscription Family.

Inscription Family Office believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Inscription Family encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### MATERIAL CHANGES

Inscription Family Office is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

### FUTURE CHANGES

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 301900. You may also request a copy of this Disclosure Brochure at any time by contacting us at (832) 802-6761.

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## ADVISORY SERVICES

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### FIRM INFORMATION

Inscription Family Office, LLC (“Inscription Family” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the State of Delaware. Inscription Family was founded in April 2019, and is owned and operated by Inscription Capital Holdings and Alvaro Trullenque. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Inscription Family Office.

### ADVISORY SERVICES OFFERED

Inscription Family offers investment advisory services to high net worth individuals and any affiliations, including but not limited to, trusts and estates (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please refer to the section titled - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Family Office Services

Inscription Family offers a full suite of Family Office services. Through a network of strategic alliances, in addition to in-house staff, we are able to offer an array of resources and services that include but are not limited to:

#### **Advanced Planning**

- Income & Tax Planning
- Liability Management
- Risk Management & Asset Protection
- Education Planning
- Retirement Planning
- Estate Planning & Wealth Transfer

#### **Life Style & Concierge Services**

- Travel Planning
- Preferential Luxury Hotel Rates
- Exclusive Access to Vacation Homes
- Health Care Concierge
- Household Staffing
- Private Aviation Consulting
- Fine Art Advisory

#### **Family Governance & Education**

- Governance Structures and Leadership Roles
- Development of Family’s Mission Statement & Values
- Coordination of Family Meetings
- Ongoing Family Financial Education

#### **Administrative Services**

- Cash Flow Planning and Budgeting
- Bill Payment and Expense Management
- Household Payroll
- Preparation of Financial Statements
- Document Storage and Management
- Tax Document Organization and Consolidation

#### **Comprehensive Financial Reporting**

- Consolidated Reporting on Family Assets, Liabilities & Cash Flows
- Aggregation at all Levels: Family Groups, Entities, Portfolios, Asset Classes, Securities & Custodians
- Tailored Reports - Monthly, Quarterly or Upon Request
- Tracking of Alternative Investments
- Private Client Portal

#### **Philanthropy Management**

- Family & Individual Legacy Planning
- Charitable Giving Strategies
- Establishment & Management of Private Foundations
- Coordination of Legal / Compliance

**Privacy & Security Management**

- Personal Security Consulting
- Data Security & Confidentiality
- Cybersecurity Consulting
- Staff Background Checks
- Private Investigation Services

**Insurance Advisory**

- Advice & Oversight
- Life
- Health
- Property & Casualty
- Excess Liability (Umbrella)
- Specialty Insurance

**Real Estate Oversight**

- Consulting & Monitoring
- Transactional Advice
- Financing
- Appraisals
- Property Management Coordination

**Coordination of Advisors**

- Investment Managers
- Bankers
- Accountants Insurance Agents
- Attorneys Real Estate Professionals
- Trustees (Individual or Corporate)

**Private Banking**

- Facilitation of Banking Services
- Checking Accounts & Credit Cards
- Mortgages
- Lines-of-credit
- Commercial and Small Business Lending
- Portfolio Collateral (Margin & Non-Purpose Loans)

**Fiduciary Services**

- Multiple Independent Trust Companies
- Trust & Estate Administration
- Custodial Services & Safekeeping
- Recordkeeping & Reporting
- Corporate Trustee Services

*Use of Affiliated Manager* – As a part of the Family Office services, Clients may engage the Affiliated Manager for its all-inclusive advisory service, where the Client is referred to utilize the portfolio management services of affiliated investment advisors (“Affiliated Manager”) for all or a portion of the Client’s portfolio. Please refer to the section titled - Other Financial Industry Activities and Affiliations for additional information. The Client will be provided with the Affiliated Manager’s Form ADV Part 2A (or a brochure that makes the appropriate disclosures) of those parties.

*Financial Planning Services* - Inscription Family, as a part of its Family Office services, may provide a variety of financial planning and consulting services to Clients. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial circumstance. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals, objectives and any other area of need of the Client.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Inscription Family may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage an Affiliated Manager for investment management services or to increase the level of investment assets with an Affiliated Manager would pose a conflict, as it would increase revenue generated for the Affiliated Manager. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

## CLIENT ACCOUNT MANAGEMENT

Prior to engaging Inscription Family to provide Family Office services, each Client is required to enter into an agreement with Inscription Family that defines the scope of services, terms, conditions, authority and responsibilities of both Inscription Family and the Client. As noted above Inscription Family provides investment advisory services on discretionary basis and may transact in certain securities for cash management purposes. Ongoing investment management services are provided in one's separate capacities with an Affiliated Manager or other Investment Manager.

## WRAP FEE PROGRAMS

Inscription Family does not manage or place Client assets into a wrap fee program.

## ASSETS UNDER MANAGEMENT

Inscription Family is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2019 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

## FEES AND COMPENSATION

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### FEES FOR ADVISORY SERVICES

#### Family Office Services

Inscription Family offers its services for a fixed annual fee ranging up to \$500,000, or an annual percentage of total assets advised upon, ranging from 0.10% to 0.40%. Fees are based on the nature, complexity and size of each relationship. Fees will be payable quarterly in arrears, at the end of each calendar quarter. Fees may be negotiable at the sole discretion of the Advisor. All securities held in accounts managed by Inscription Family will be independently valued by the Custodian. Inscription Family will not have the authority or responsibility to value portfolio securities.

*Use of Affiliated Manager* – For Clients referred to Affiliated Managers and engaged with the Affiliated Manager for its all-inclusive advisory service, the Affiliated Manager will deduct the total advisory fee from the Client account[s], where a portion of the fees will be provided to the Advisor. The Advisor will not receive any additional fees from the Affiliated Manager.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

### FEE BILLING

#### Family Office Services

Fixed fee arrangements are invoiced by the Advisor, at the end of each quarter, and are due upon receipt or will be deducted from the Client's account[s] at the Custodian. Asset based fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the end of the quarter. The amount due is calculated by applying the quarterly rate (annual

rate divided by 4) to the total assets advised with Inscription Family at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the fee. It is the Client's responsibility to review the deducted fees to ensure they are correct, as the Custodian will not do so. Clients provide written authorization permitting fees to be deducted by Inscription Family to be paid directly from their account[s] held by the Custodian as part of the agreement and separate account forms provided by the Custodian.

Certain clients may elect to pay Family Office fees directly versus a deduction from the client's account with the Custodian.

*Use of Affiliated Manager* – For Clients referred by the Advisor to the Affiliated Manager, the Client's overall fees will be deducted by the Affiliated Manager.

## OTHER FEES AND EXPENSES

Clients may incur certain fees or charges imposed by entities, other than Inscription Family, in connection with investments made on behalf of the Client, including investment advisory fees, commissions, custody fees and/or securities execution fees. The Family Office services charged by Inscription Family is separate and distinct from these fees. In addition, all fees paid to Inscription Family are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee.

## ADVANCED PAYMENT OF FEES AND TERMINATION

### Family Office Services

Inscription Family is compensated for its services at the end of each quarter, after services are rendered. Either party may terminate the Family Office agreement by providing advance notice to the other party. Upon termination, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's agreement with the Advisor is non-transferable without the Client's prior consent.

*Use of Affiliated Manager* – In the event that a Client should wish to terminate their relationship with the Affiliated Manager, the terms for termination will be set forth in the respective agreements between the Client and that Affiliated Manager. Inscription Family will assist the Client with the termination and transition as appropriate.

## COMPENSATION FOR SALES OF SECURITIES

Inscription Family does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also registered representatives of Purshe Kaplan Sterling Investments ("PKS"). PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In one's separate capacity as a registered representative of PKS, the Advisory Person may implement securities transactions under PKS and not through Inscription Family. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by the Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Advisory Person who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please refer to section titled - Other Financial Industry Activities and Affiliations.

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional,

the Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.

## PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

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Inscription Family does not charge performance-based fees for its investment advisory services. The fees charged by Inscription Family are as described in section titled “Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

Inscription Family does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## TYPES OF CLIENTS

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Inscription Family offers investment advisory services to high net worth individuals and any affiliations, including but not limited to, trusts and estates. Inscription Family generally does not impose a minimum relationship size.

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

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### METHODS OF ANALYSIS

Inscription Family offers investment advisory services and will gather information from financial newspapers, magazines, inspection of corporate activities, research materials, annual reports, prospectuses and company releases in order to effectively implement its services for the Client.

### RISK OF LOSS

While the methods of analysis help the Advisor in evaluating a potential investment or perform its Family Office service, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate.

Clients engaged with the Advisor, must provide full and accurate disclosure of requested information, which is essential for the analysis of a Client's engagement. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.



## DISCIPLINARY INFORMATION

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Alvaro Trullenque has a court action initiated against him by Rodney Starkey, Et Al. The principal relief sought is restitution. The filing date of the Court Action was 05/08/2009. The principal product type named in the action was an International Bank CD. Formal Action was brought in the 19th Judicial District Court, Parish of Baton Rouge, Louisiana, (C578192). The employing firm when the activity occurred which led to the civil judicial action was Stanford Group Company. The allegations related to this civil action were: material representation, negligence, breach of contract, breach of fiduciary duty, and unfair trade practices. The current status is pending.

The affiliated person, Alvaro Trullenque, has only one client in this class action suit. The client, an accredited investor invested a small percentage of his investable assets in an international certificate of deposit(s) as part of an overall diversified portfolio. This matter relates solely to that investment.

Inscription Family values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 301900.

## OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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### RELATED REGISTERED INVESTMENT ADVISOR

Inscription Family is under common control with the Affiliated Managers, which are two affiliated SEC-registered investment advisors, Inscription Capital, LLC (CRD# 291780 and herein referred to as "Inscription") and Camden Wealth Advisors LLC (CRD# 148518 and herein referred to as "Camden"). Inscription and Camden serve as investment managers, primarily serving high net worth individuals, family offices and trusts. Certain Advisory Persons of Inscription Family also serve as Advisory Persons of Inscription or Camden. Inscription and Camden may also provide investment advisory services to Clients of Inscription Family. In such instances, Inscription and/or Camden provides each Client with all relevant disclosures, including the Inscription and/or Camden Disclosure Brochure.

Additionally, the Advisor is affiliated, through common control, with Inscription and Camden. In certain circumstances, Inscription Family may recommend Inscription and/or Camden to act as an investment manager to a portion or all Client assets. Inscription and/or Camden may provide financial planning, investment advisory and certain portfolio management services. This poses a conflict of interest as owners may benefit from additional revenues generated. Clients of Inscription Family are under no obligation to accept the recommendations of Inscription Family to engage with Inscription and/or Camden for advisory services.

### MERCHANT WEALTH MANAGEMENT HOLDINGS, LLC

Merchant Wealth Management Holdings, LLC ("Merchant Wealth"), a subsidiary of Merchant Investment Management, LLC ("Merchant Investment"), owns a minority, non-controlling interest in the Advisor. Merchant Investment, through subsidiaries other than Merchant Wealth, has ownership interests in various companies that provide investment and other consulting services to registered investment advisors ("Investment Solutions"). The Advisor is provided access for their use, or recommend that Clients use, these Investment Solutions, where the Advisor utilizes certain Investment Solutions pursuant to an engagement that the Advisor enters into directly with the Investment Solution. These investment solutions include, but are not limited to, third party money managers, private investments, pooled investment vehicles, or other investment products for which a commission is earned. Engagement of and with these Investment Solutions poses a potential conflict of interest due to the minority ownership interest that Merchant Investment's various subsidiaries own in the third parties providing these investment solutions. Through Merchant Investment's minority ownership interests in the third parties that provide these investment solutions, Merchant Investment will benefit from additional revenue that is generated when the Advisor engages any of these third-party service providers. Accordingly, the Advisor may have an incentive to engage one or more of these third parties to provide investment solutions. In an effort to ensure these conflicts of interest are addressed, the Advisor has implemented a risk control and disclosure framework, the objective

of which is for the Advisor to select investment solutions that are in the best interest of the Client. Lastly, as referenced above, the Advisor is not controlled by Merchant Wealth or Merchant Investment, and is operated independently where Merchant Investment and all other related subsidiaries are not involved with the services offered by the Advisor and maintains its own office space.

## INSURANCE AGENCY AFFILIATIONS

As noted in section titled "Fees and Compensation", certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Inscription Family. As an insurance professional, the Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. The Advisory Person is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisory Persons or the Advisor.

## BROKER-DEALER AFFILIATION

Certain Advisory Persons are also registered representatives of PKS. PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In one's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor the Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative.

## CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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### CODE OF ETHICS

Inscription Family has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Inscription Family (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Inscription Family and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Inscription Family's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (832) 802-6761.

### PERSONAL TRADING WITH MATERIAL INTEREST

Inscription Family allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, through an Affiliated Manager. Inscription Family does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Inscription Family or the Affiliated Manager does not have a material interest in any securities traded in Client accounts.

### PERSONAL TRADING IN SAME SECURITIES AS CLIENTS

Inscription Family allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, through an Affiliated Manager. Owning the same securities presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to

address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, through an Affiliated Manager, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Inscription Family requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

## PERSONAL TRADING AT SAME TIME AS CLIENT

While Inscription Family allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, through an Affiliated Manager, such trades are typically aggregated with Client orders or traded afterwards. At no time will Inscription Family, or any Supervised Person of Inscription Family, transact in any security to the detriment of any Client.

## BROKERAGE PRACTICES

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### RECOMMENDATION OF CUSTODIAN[S]

Inscription Family does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Inscription Family to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Inscription Family does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Inscription Family does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Inscription Family. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Inscription Family may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

Following are additional details regarding the brokerage practices of the Advisor:

1. *Soft Dollars* - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services.

Inscription Family does not participate in soft dollar programs sponsored or offered by any broker-dealer.

2. *Brokerage Referrals* - Inscription Family does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. *Directed Brokerage* - All Clients are serviced on a "directed brokerage basis", where Inscription Family will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Inscription Family will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian. make.

## AGGREGATING AND ALLOCATING TRADES

The Advisor only transacts in cash or cash equivalents, tailored specifically to the Client's objectives and cash needs. Therefore, the Advisor will not block or aggregate trades on behalf of its Clients.

## REVIEW OF ACCOUNTS

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### FREQUENCY OF REVIEWS

Cash and cash equivalents in Client accounts are monitored on a continuous basis by the Advisor. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

The Advisor will be performing ongoing reviews of Family Office Client's situations and needs. The Client is encouraged to notify Inscription Family if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan or needs. Additional reviews may be triggered by material market, economic or political events.

### CAUSES FOR REVIEWS

Each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts and the respective cash needs may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Inscription Family if changes occur in the Client's personal financial situation that might adversely affect the Client's objectives or cash needs.

### REVIEW REPORTS

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

## CLIENT REFERRALS AND OTHER COMPENSATION

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### COMPENSATION RECEIVED BY INSCRIPTION FAMILY

Inscription Family may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Inscription Family may receive non-compensated referrals of new Clients from various third-parties.

### CLIENT REFERRALS FOR SOLICITORS

Inscription Family does not engage paid solicitors for Client referrals.

## CUSTODY

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Inscription Family has “custody” of client accounts as defined in Rule 206(4)-2 under the Investment Advisers Act of 1940 as the Advisor offers bill pay services to Clients as part of its Family Office services. All Clients must place their assets with a “qualified custodian”. Clients are required to enter into an agreement with the Custodian to retain their funds and securities and direct Inscription Family to utilize the Custodian for the Client’s security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Inscription Family to ensure accuracy as the Custodian does not perform this review.

## SURPRISE INDEPENDENT EXAMINATION

As Inscription Family is deemed to have custody over certain Client accounts and/or securities as part of its Family Office and/or trustee services, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which Inscription Family maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC’s Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).

## INVESTMENT DISCRETION

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Inscription Family may make transactions in Client Account[s] for cash management purposes, where the Advisor will generally has discretion over Client accounts. This investment discretion grants the Advisor the authority to determine the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified objectives, guidelines, or limitations previously set forth by the Client and agreed to by Inscription Family. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client’s execution of an agreement containing all applicable limitations to such authority. All discretionary trades made by Inscription Family will be in accordance with each Client’s investment objectives and goals.

## VOTING CLIENT SECURITIES

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Inscription Family does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## FINANCIAL INFORMATION

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Neither Inscription Family, nor its management, have any adverse financial situations that would reasonably impair the ability of Inscription Family to meet all obligations to its Clients. Neither Inscription Family, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Inscription Family is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

## PRIVACY POLICY

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Effective: May 1, 2019

### Our Commitment to You

Inscription Family Office, LLC ("Inscription Family" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Inscription Family (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Inscription Family does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

#### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Inscription Family does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Inscription Family or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Inscription Family does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

#### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

#### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (832) 802-6761.