

Cover Page
Firm Brochure
Part 2A of Form ADV

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Cullen Investment Group, Ltd is a FINRA broker-dealer founded in 1987. Cullen Investment Group is also an investment advisor. We conduct our advisory business primarily under the name of Cullen Asset Management, abbreviated CAM in this brochure.

This brochure provides information about the qualifications and business practices of CAM. 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. If you have any questions about the contents of this brochure, please contact us at 337-237-8000 or Cullen@CullenOnline.com.

Additional information about CAM is available on the SEC's website at www.adviserinfo.sec.gov.

March 18, 2021

Material Changes

We have no material changes since our last annual update of our firm brochure on March 27, 2020.

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Advisory Business. As an independent registered investment advisor, CAM provides fee-based money management services to qualified investors. This process involves the careful selection of individual stocks, bonds, and in some cases mutual funds to create a portfolio that is tailored to the client's objectives. We begin with ascertaining the needs and goals of that particular client, whether growth, income, capital preservation (or a combination), as well the client's time frame and risk tolerance. Clients fill out a questionnaire outlining their investment objectives. Clients may impose restrictions on investing in certain securities or types of securities.

CAM manages both discretionary and non-discretionary accounts, which we call advisory accounts. Cullen Investment Group has a fully disclosed clearing arrangement with Raymond James & Associates. Of the total assets held on behalf of Cullen Investment Group, the amount of advisory accounts was five hundred forty-two million, six hundred nineteen thousand dollars as of March 17, 2021. Of that amount, 100% are managed on a discretionary basis, and none on a non-discretionary basis. Currently we manage no wrap-fee accounts.

David C. Bordes is the president and founder of Cullen Investment Group and CAM. With over 40 years' experience in the investment business, David formed Cullen Investment Group in 1987 as an NASD (now FINRA) broker-dealer. Stephen L. Nickel, Vice-President of the firm, became part owner in 2017.

Fees and Compensation. We bill advisory accounts on a fee basis, typically a percentage of the market value of the assets under management annually. The percentage declines for larger accounts, based on the value of assets under management: \$0 to \$1,000,000, 1%; \$1,000,001 to \$5,000,000, 3/4%; \$5,000,001 to \$20,000,000, 1/2%; and over \$20,000,000, negotiable. The minimum new account size is generally \$500,000. Smaller accounts, if accepted, may be charged a minimum annual fee of 1% or \$1,000, whichever is larger. Fees are negotiable. (Pre-existing advisory clients are subject to account requirements and advisory fees in effect at the time the client entered into the advisory relationship.)

When a client opens an advisory account, the fee for the remainder of the current quarter is billed in advance, based on the initial balance. Thereafter, quarterly fees are billed in advance based on the asset value at the end of the previous calendar quarter. The fee is usually deducted from the client's assets the next business day. Alternatively, a client may choose to pay the fee by check. An investment advisory agreement may be terminated by either party

at any time by written notice. Upon termination, the prorated amount of the fee for the remainder of the quarter is reimbursed to the client.

In addition to advisory fees paid to CAM, clients are responsible for fees and expenses charged by custodians and broker-dealers, including transactions fees, annual IRA fees, and account closure fees, all of which we disclose to the client before opening the account. (See also *Brokerage Practices*, discussed later.)

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. Clients are responsible for these fees in addition to the fees paid to CAM. In addition to recommending no-load funds, from time to time CAM may select Class A mutual funds at Net Asset Value (NAV) for a client's account. These funds may pay a trail or 12B-1 fees. In addition, the money-market funds used for client accounts may pay 12B-1 fees. The mutual fund or money-market funds pay these 12B-1 fees to the broker-dealer, Cullen Investment Group. Because this is some compensation to Cullen Investment Group, we are required to advise clients of a potential conflict of interest in the incentive to recommend investment products based upon the compensation received. We feel that any conflict is minimized as these fees are incidental in comparison to CAM's compensation for investment management, leaving our overriding incentive to grow the account. In addition we screen these mutual funds based on the qualifications of their managers and certain investment criteria that match our investment strategy. (See *Methods of Analysis, Investment Strategies, etc.*, discussed later.) One criterion we use to select money-market funds is that they have an "automatic sweep" feature that is a great convenience to servicing the client. This facilitates efficient management of the account, as it allows purchases and sales of securities from cash without numerous unwieldy transactions or transfers from firms other than our clearing firm.

We disclose potential conflicts in this Firm Brochure which we provide all clients when they open accounts. Clients have the option to purchase investment products that we recommend through other brokers that are not affiliated with CAM.

Performance-Based Fees. CAM does not offer this arrangement, so has no disclosures on this subject.

Types of Clients. CAM is dedicated to providing investment management services to a wide variety of clients: individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, LLC's, corporations, and other business entities. (For minimum account size, see *Fees*, above.)

Methods of Analysis, Investment Strategies and Risk of Loss. The strategy we employ is an investment approach based primarily on fundamental analysis. We call it our Basic Value Strategy and we adhere to this approach with all of our clients. Typically we invest in individual stocks and bonds. We look for companies that have attractive business models, solid finances, and high quality management. We focus on securities that are attractive in relation to their sales, book values, projected rates of growth, returns on equity, and financial strength. Within this framework we seek issues selling at what we perceive are attractive discounts to their intrinsic value. Accounts are typically diversified over a list of 20-40 companies. Our strategy is essentially long term. We generally hold positions three to five years or longer. We do not believe it pays to try to "time the market." We also believe it is a mistake to actively trade. Our turnover rate for our advisory accounts is very low in relation to our overall assets. In addition to reducing transaction costs, this strategy potentially lowers tax liability. This value approach pervades all aspects of our business and is applied not only to the selection of individual stocks and bonds, but also to our efforts in choosing and recommending open-end and closed-end funds where appropriate, and any other investment vehicles.

Sources of information for selecting securities include financial publications, inspections of corporate activities, annual reports, prospectuses, filings with the SEC, and company press releases. Other sources of information include Morningstar, Value Line, corporate rating services, and various research materials prepared by others. Investing in securities involves the risk of loss of value that clients should be prepared to bear. We attempt to minimize risk when possible by diversification and asset allocation. Upon opening an account, we discuss with the client the risk of loss in the account and the client's tolerance for risk.

Disciplinary Information. We are required to disclose legal or disciplinary events material to a client's evaluation of our business or the integrity of management. The firm and its employees have no events to disclose.

Other Financial Industry Activities and Affiliations. Cullen Investment Group is both a FINRA broker-dealer and a registered investment advisor conducting investment advisory services through CAM. The Firm's primary

business and the bulk of its revenues are derived from the ongoing management of investment advisory accounts on a fee basis through CAM. The Firm conducts brokerage-related activities comprised of client-directed accounts and clearing trades for CAM (on a cost basis). The Firm does not offer full-service brokerage accounts; its only commission-based retail brokerage activity is via direct brokerage accounts—a platform exclusively for client-directed accounts, with no advice or recommendations offered by the Firm.

Historically when the Firm offered full-service brokerage, we divulged potential conflicts of interest pertaining to whether clients would be brokerage or advisory, based on the differing amounts and types of compensation the firm would receive, namely, commission versus fees. The Firm no longer conducts advice-driven commission-based brokerage business.

David C. Bordes and Stephen L. Nickel are CAM account managers and registered representatives of Cullen Investment Group as broker-dealer. As account managers, they receive advisory fees from advisory account holders, and as registered representatives, they receive brokerage commissions from brokerage account holders. (See *Fees and Compensation* discussed above; see also *Brokerage Practices* discussed later.)

CAM and its account managers have arrangements that are material to its advisory business with a related person who is a lawyer and with a law firm. Stephen L. Nickel, an owner, account manager, and general principal of Cullen Investment Group, is also the principal in his own law firm, a professional law corporation, and shares office space with his law firm. This relationship has not created any material conflict of interest with clients. Anne Gaiennie is a registered representative, registered investment adviser, and general principal of Cullen Investment Group and an attorney. Cullen Investment Group and CAM have consulted with her as attorney. The relationship has not created any material conflict of interest with clients.

Code of Ethics, Fiduciary Duty, Participation or Interest in Client Transactions and Personal Trading. The employees of CAM have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. CAM has the fiduciary obligation to exercise its authority for the benefit of its clients, to place the interest of its clients first, and to refrain from having outside interests that conflict with the interests of its clients. Our Code provides for oversight, enforcement, and recordkeeping. CAM and its employees must avoid any circumstances that might adversely affect or appear to affect its duty of complete loyalty to its clients. Employees comply with the provisions of the *CAM Compliance Manual*.

CAM and its associated persons may buy or sell for their own accounts securities that are held by clients or that are recommended to clients. Employees may not trade their own securities ahead of client trades. To avoid the risk of a conflict called “front running,” CAM always requires that the client get an equal price or, if there is a price difference, the better price than any employee or related person who traded the same security the same day. CAM maintains records of purchases or sales for all securities by CAM, its associated persons, or related entities. The Chief Compliance Officer of CAM, David C. Bordes, reviews all employees’ and related-persons’ trades daily and quarterly. His personal trades are reviewed by Stephen L. Nickel. These reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employees or persons related to them.

Although we attempt to contact clients who hold non-discretionary accounts promptly when recommending an investment, we often take investment action for discretionary accounts before taking the same action for non-discretionary accounts, because of the pre-existing trading authority.

Brokerage Practices. In selecting brokers and determining the reasonableness of their commissions, CAM primarily considers which broker provides best execution at reasonable expense. Consistent with this standard, CAM may place trades with its affiliate, Cullen Investment Group. We suggest this broker but do not require clients to use it. If a client authorizes CAM to place trades through Cullen Investment Group, we pass trades through at our cost. Cost is defined as the clearing charges assessed by our clearing firm. Cullen Investment Group generally executes its trades through Raymond James, a broker-dealer with whom Cullen Investment Group has a fully-disclosed clearing arrangement. Commission costs are the lowest rate available to Cullen Investment Group based on its volume of activity with Raymond James, but may be higher or lower than commission rates at other broker-dealers. CAM does not receive soft-dollar benefits such as research or services other than execution in return for transactions. With CAM's fiduciary duty to obtain best execution of securities transactions, we will make a good-faith determination that the amount of commissions allocated to the broker is reasonable in relation to the value of the brokerage service. If a client directs CAM to use a particular broker, we might not be authorized to negotiate commissions or obtain volume discounts or best execution. In addition, a disparity in commission charges may

exist between clients who direct CAM to use a particular broker and those who do not. Not all advisers require their clients to direct brokerage. We believe that we achieve best execution through our arrangement with Raymond James. However, by directing clients to use a particular broker, we may be unable to achieve most favorable execution and this practice may cost clients more money.

CAM may occasionally effect a securities transaction in which an advisory client buys from or sells to a Cullen Investment Group brokerage customer. This transaction would be considered an agency cross and would require disclosure to and approval by the client. From time to time, CAM executes block trades. This occurs when CAM finds buying or selling a security to be suitable for a large number of our clients. If a client directs CAM to use a particular broker, the client will not be included in block trades; in such a case the client might not receive the same execution, price, or commission.

Review of Accounts. Individual investment advisors review their clients' accounts at least once a quarter. Advisors review performance, balance, transactions, and current security positions, all with a view to the investment objectives of the client. These quarterly reviews are performed by the individual account manager, namely David C. Bordes or Stephen L. Nickel. David C. Bordes as Chief Compliance Officer also reviews every account quarterly. Account reviews may be more frequent when market conditions dictate. Account review is also triggered by a client meeting, material developments in the portfolio, and cash flow to or from the account. Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation. At least each calendar quarter CAM provides clients a written portfolio statement of their account, including market value of the portfolio, name and amount of each security, percentage weight of each position and each group of positions (equities, fixed-income securities, etc.), current market value of each security, cash balance, unrealized gains and losses (in dollar amount and percentage), and current yields. On request, we furnish performance reports as well as supplemental tax information.

Client Referrals and Other Compensation. CAM does not compensate anyone for client referrals. Nor will CAM permit our financial advisors or any related persons to compensate anyone for referrals. CAM does not accept referral fees or any form of remuneration from other professionals.

Custody. We do not keep any client funds or securities. All accounts are carried by Raymond James or other qualified custodians. The qualified custodians provide account statements directly to clients monthly. As discussed above in *Fees and Compensation*, CAM directly debits advisory fees from client accounts held at Raymond James if the client authorizes this convenient method of paying the advisory fee. (We do not have this arrangement with any other custodian.) In such a case CAM advises Raymond James of the amount of the fee to be deducted from the client's account on a quarterly basis. To the extent that a firm has an arrangement under which it is authorized to withdraw client funds maintained with a custodian upon instruction to the custodian, a firm is deemed to have "custody" under the ADV glossary definition. Because the actual custodian Raymond James does not calculate the amount of the fee to be deducted, clients must carefully review our advisory bill to verify the accuracy of the fee calculation as well as Raymond James' statements to verify the accuracy of the fee deduction. CAM urges clients to compare the account statements sent to them directly by the custodian to the quarterly portfolio statements sent to them by CAM.

Investment Discretion. For discretionary accounts, clients sign an investment management contract with full disclosure of our discretion, receive an explanation of our investment strategy, and receive this Brochure as well as Cullen Investment Group's brochure. Discretion is limited to selection of securities, amount of securities, and negotiation of commissions. Clients may limit our discretion according to their desires.

Voting Client Securities. CAM is not responsible for voting of proxies on behalf of clients. Clients are expected to vote their own proxies. If a client requests assistance on voting, CAM will provide recommendations. If a conflict of interest exists, it will be disclosed to the client. Clients may obtain a copy of CAM's proxy voting policies upon request.

Financial Information. CAM does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. We are not required to disclose further on this subject.

Requirements for State-Registered Advisors. We are SEC-registered and not required to disclose under this section.

This page provides information about David C. Bordes, Stephen L. Nickel, Anne Gaiennie, and Katelyn Dubuc, that supplements the Cullen Asset Management (CAM) brochure. You should have received a copy of that brochure. Please contact David C. Bordes if you did not receive CAM's brochure or if you have any questions about the contents of this supplement.

Additional information about David C. Bordes, Stephen L. Nickel, Anne Gaiennie, and Katelyn Dubuc is available on the SEC's website at www.adviserinfo.sec.gov.

David C. Bordes Cullen Asset Management 1404 S. College Road Lafayette, LA 70503 337/237-8000 Cullen@CullenOnline.com	Born Educational Background: Business Experience: Disciplinary Information: Other Business Activities: Additional Compensation:	1953 Tulane University, B.A., 1975 President, Cullen Investment Group 1987-present Prudential Bache Securities 1983-87 Shearson American Express 1978-83 Howard, Weill, Labuisse, Friedrichs 1975-78 None President, Cullen Properties, L.L.C. President, Cullen Production, L.L.C. President, Cullen Aviation, L.L.C. David C. Bordes profits from the firm as owner.
Stephen L. Nickel 521 S.W. Court Circle Crowley, LA 70526 337/785-0960 Cullen Asset Management 1404 S. College Road Lafayette, LA 70503 337/237-8000	Born Educational Background: Business Experience: Disciplinary Information: Other Business Activities: Additional Compensation:	1973 Louisiana State University Law Center, J.D., 1998 Cullen Investment Group 2003-Present Franklin Life/American Gen. 2000-03 Attorney, Oats & Hudson 1999-2000 None Attorney, Stephen L. Nickel, APLC Stephen L. Nickel profits from the firm as owner.
Anne Gaiennie Cullen Asset Management 1404 S. College Road Lafayette, LA 70503 337/237-8000	Born Educational Background: Business Experience: Disciplinary Information: Other Business Activities: Additional Compensation:	1957 Tulane Law School, honor graduate 1983 Newcomb College, honor graduate 1979 Cullen Investment Group 2004-present Judicial Law Clerk, 1985-2002 Attorney, Milling Law Firm, 1983-85 None Attorney None
Katelyn Dubuc Cullen Asset Management 1404 S. College Road Lafayette, LA 70503 337/237-8000	Born Educational Background: Business Experience: Disciplinary Information: Other Business Activities: Additional Compensation:	1990 University of La. at Lafayette, BS, 2013 Cullen Investment Group 2013-present None None None

Supervision:

David C. Bordes is responsible for all employee supervision. Stephen L. Nickel, Anne Gaiennie, and Katelyn Dubuc are supervised by David C. Bordes, President and Chief Compliance Officer. He reviews their work through frequent office interactions, review of trades daily, as well as remote interactions. Stephen L. Nickel, Vice President of Cullen Investment Group, reviews David C. Bordes's trades daily. David's contact information is 337/237-8000 or cullen@cullenonline.com; Stephen's is 337/237-8000, 337/785-0960 or stephen@cullenonline.com; Anne's is 337/237-8000 or anne@cullenonline.com; and Katelyn's 337/237-8000 or katelyn@cullenonline.com

Required Disclosures for State-Registered Advisers: not applicable as we are SEC-registered.