



# Form ADV Part 2A Firm Brochure

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This brochure provides information about the qualifications and business practices of Entrust Investment Services, Inc. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 248-905-1676. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Entrust Investment Services, LLC (CRD #324860)  
is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Item 2:

## MATERIAL CHANGES

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the release of the Firm Brochure.

### **Material Changes since the Last Update**

The last update to this brochure was made on April 1, 2023. The updates included:

- Adjusting the Firm's corporation status from a Limited Liability Company to a Corporation and updating the name herein.
- Adding Robert Antonio Trejo to the Firm's Principle Executive Officers and Management Persons
- Updating the Ownership disclosure of Entrust Investment Services to add Robert Trejo.

Item 3:

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## ITEM 4:

**ADVISORY FIRM****Firm Description**

Entrust Investment Services, Inc (“Entrust Investment Services”) was founded in January of 2023. Kyle J McCauley and Robert A Trejo are the sole owners of this Corporation. Entrust Investment Services was founded primarily to provide investment management services to three primary clients. First, to other Registered Investment Advisors and their clients through Third-Party Asset Management programs. Second, Entrust Investment Services works with High-Net-Worth Individuals in its Private Client Offering which includes Comprehensive Financial Planning services. Lastly, Entrust Investment Services also works with individuals, households, and businesses to provide specific portfolio management services.

**Types of Advisory Services****THIRD-PARTY ASSET MANAGEMENT**

Entrust Investment Services offers discretionary asset management services through a Third-Party Asset Management arrangement. In that relationship, Entrust Investment Services is acting as a portfolio manager for a specific investment account, but the owner of that account is the client of a different Registered Investment Advisor other than Entrust Investment Services.

**INVESTMENT MANAGEMENT**

Entrust Investment Services offers discretionary investment management services to its Private Clients and its Investment Clients. Investment Management services will consider the client’s goals, planning objectives, knowledge level and experience, risk tolerance, risk capacity, various time horizons, cash flow needs, tax related variables, and individual preferences before constructing and offering specific investment portfolio advice and recommendations.

Should a client decide to take action based upon the recommendations of Entrust Investment Services, the client will authorize their custodian to allow Entrust Investment Services to have discretionary authority to buy and sell the appropriate securities on the client’s behalf in their investment account. Such investments would be handled in a manner agreed upon by the client and their advisor as described in an Investment Advisory Agreement.

## ERISA PLAN SERVICES

Entrust Investment Services provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Entrust Investment Services may act as 3(38) advisor an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. Entrust Investment Services would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

### 1. Fiduciary Services are:

- Entrust Investment Services has discretionary authority and will make the final decision regarding the initial selection, retention, removal, and addition of investment options in accordance with the Plan's investment policies and objectives.
- Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan.
- Provide discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

### 2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the Entrust Investment Services' assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the Entrust Investment Services is not providing fiduciary advice as defined by ERISA to the Plan participants. Entrust Investment Services will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees. Entrust Investment Services may provide these services or, alternatively,

may arrange for the Plan's other providers to offer these services, as agreed upon between Entrust Investment Services and Client.

3. Entrust Investment Services has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will not be included in calculation of Fees paid to the Adviser on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

## SEMINARS

Entrust Investment Services holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. Entrust Investment Services does not charge a fee for attendance to these seminars.

## FINANCIAL PLANNING

Entrust Investment Services offers specified scope financial planning services to all clients. The services to be performed will be outlined in the financial planning agreement. Entrust Investment Services reserves the right to waive the fee should the Client implement the plan through Entrust Investment Services.

## **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without prior written client consent.

## Wrap Fee Programs

Entrust Investment Services does not sponsor any wrap fee programs.

## Client Assets Under Management

As of April 1, 2021, Entrust Investment Services had approximately \$126,511,400, in client assets under management on a discretionary basis through Direct Management and through Third-Party Asset Management Programs and \$0 on a non-discretionary basis.

Item 5:

## FEES AND COMPENSATION

### Method of Compensation and Fee Schedule

#### ASSET MANAGEMENT

Entrust Investment Services charges an annual investment advisory fee based on the total assets under management with a maximum annual fee of 2% of the assets managed. The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed quarterly in advance or in arrears based on the amount of assets managed as of the close of business on the last business day of the quarter. Pursuant to CCR Section 260.238(j), lower fees for comparable services may be available from other sources. Total fees to Client will never exceed the safe harbor threshold of 3% of assets under management per year. (CCR Section 260.238(j) is a California code and may not apply to states other than California.) Clients may terminate their account within seven (7) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, fees will be prorated based on the day's services are provided during the given period. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

If Entrust Investment Services is authorized or permitted to deduct fees directly from the

account by the custodian:

- Entrust Investment Services will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee;
- Entrust Investment Services will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

If Sub-Advisors are hired, there is no additional fee to the Client. When utilizing the unified managed account program through Overlay Portfolio Management, the total annual fee will not exceed 2% of the assets under management. Sub-advisor fees will generally range 0.10% - 0.90%.

#### ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 2%. The annual fee is negotiable and may be charged as a percentage of the Included Assets or as a flat fee. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, Entrust Investment Services shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of Entrust Investment Services for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Entrust Investment Services does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Entrust Investment Services will disclose this compensation, the services rendered, and the payer of compensation. Entrust

Investment Services will offset the compensation against the fees agreed upon under the Agreement.

## SEMINARS

Entrust Investment Services does not charge fees for seminars.

## FINANCIAL PLANNING

Fees are non-negotiable and are billed 50% in advance with the balance due upon delivery of the plan. Services are completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation. Client may cancel within seven (7) business days of signing Agreement with no obligation and without penalty. If the Client cancels after seven (7) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Entrust Investment Services. Entrust Investment Services reserves the right to waive the fee should the Client implement the plan through Entrust Investment Services.

## HOURLY FEES

Planning services are also available for a fee of \$500 per hour.

For Clients located in Pennsylvania: If a client does not receive a copy of this brochure at least 48 hours prior to signing an agreement, the client has five business days in which to cancel the agreement, without penalty.

## Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA services are either deducted from the Plan assets or paid direct to Entrust Investment Services. The Client must consent in advance to direct debiting of Plan assets.

Fees for Financial Plans are paid direct to Entrust Investment Services.

## Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees. These transaction

charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

### **Prepayment of Client Fees**

Entrust Investment Services does not require any prepayment of fees of more than \$1200 per Client and six months or more in advance.

### **External Compensation for the Sale of Securities to Clients**

Investment Advisor Representatives of Entrust Investment Services may be licensed insurance agents. From time to time, they will offer clients advice or products from this activity and may receive commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to act in the best interest of their clients and will act in accordance with those responsibilities. Clients are not required to purchase recommended products.

Item 6:

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

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7:

## **TYPES OF CLIENTS**

### **Description**

Entrust Investment Services generally provides investment advice to individuals, high net worth individuals and businesses.

### **Account Minimums**

Entrust Investment Services generally requires a minimum of \$100,000 to open an account but reserves the right to waive this at their sole discretion.

Item 8:

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

### Methods of Analysis

Entrust Investment Services uses Modern Portfolio Theory. Modern Portfolio Theory is the theory of finance that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. The risk with Modern Portfolio Theory is that investments are made based on forecasting models that don't adapt to ever changing market conditions.

The main sources of information include eMoney, Morningstar, financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

### Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each Client executes a client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options, or spreading strategies).

### Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investing in securities involves risk of loss that clients should be prepared to bear. Investors face the following investment risks and should discuss these risks with Entrust Investment Services:

- **Market Risk:** The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions

affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Inflation Risk:** When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Management Risk:** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- **Equity Risk:** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- **Fixed Income Risk:** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

- **Investment Companies Risk:** When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.
- **Foreign Securities Risk:** Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- **Long-term purchases:** Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- **Short-term purchases:** Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- **Trading risk:** Investing involves risk, including possible loss of principal. There is no

assurance that the investment objective of any fund or investment will be achieved.

- **Options Trading:** The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.
- **Leveraged Risk:** The risks involved with using leverage may include compounding of returns (this works both ways – positive and negative), possible reset periods, volatility, use of derivatives, active trading, and high expenses.

The risks associated with utilizing Sub-Advisors include:

- **Manager Risk**
  - Sub-Advisor fails to execute the stated investment strategy
- **Business Risk**
  - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor’s which is disclosed in the Sub-Advisor’s Form ADV Part 2.

Item 9:

## DISCIPLINARY INFORMATION

### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Pursuant to Mass. Code Regs. 12.205(8)(d), Client can obtain the disciplinary

history of Entrust Investment Services or its representatives upon request of the Massachusetts Securities Division.

Item 10:

## OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### **Broker-Dealer or Representative Registration**

Entrust Investment Services has no employees that are registered representatives of a broker dealer.

### **Futures or Commodity Registration**

Neither Entrust Investment Services nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Members Kyle McCauley and Robert Trejo are licensed insurance agents. From time to time they may offer clients advice or products from insurance companies, which would generate a commission for the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of their clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Item 11:

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

### **Code of Ethics Description**

The employees of Entrust Investment Services have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Entrust Investment Services employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Entrust Investment Services. The Code reflects Entrust Investment Services and its supervised persons’ responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Entrust Investment Services’ policy prohibits any person from acting upon or otherwise misusing non- public or inside information. No advisory representative or other employee, officer or director of Entrust Investment Services may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Entrust Investment Services’ Code is based on the guiding principle that the interests of the client are our top priority. Entrust Investment Services’ officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When the conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non- public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Entrust Investment Services and its employees do not recommend to clients, securities in which we have a material financial interest.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Entrust Investment Services and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as trading ahead of client trades, employees are required to disclose all reportable securities transactions as well as provide Entrust Investment Services with copies of their brokerage statements.

The Chief Compliance Officer of Entrust Investment Services is Kyle J McCauley. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

## **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Entrust Investment Services does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Entrust Investment Services with copies of their brokerage statements.

Item 12:

## **BROKERAGE PRACTICES**

### **Factors Used to Select Broker-Dealers for Client Transactions**

Entrust Investment Services will offer the use of Charles Schwab & Co., Inc. ("Schwab") All rights reserved. Member SIPC, an unaffiliated SEC-registered broker-dealer and FINRA member to custody client assets. Entrust Investment Services will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Entrust Investment Services relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Entrust Investment Services.

Entrust Investment Services participates in TD Ameritrade's institutional customer program and Entrust Investment Services may recommend Charles Schwab & Co., Inc to Clients for custody and brokerage services. There is no direct link between Entrust Investment Services' participation in the program and the investment advice it gives to its clients, although Entrust Investment Services receives economic benefits through its participation in the program that are typically not available to Charles Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Entrust Investment Services participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Entrust Investment Services by third party vendors.

Charles Schwab may also pay for business consulting and professional services received by Entrust Investment Services' related persons. Some of the products and services made available by Charles Schwab through the program may benefit Entrust Investment Services but may not benefit its client accounts. These products or services may assist Entrust Investment Services in managing and administering Client accounts, including accounts not maintained at Charles Schwab. Other services made available by Charles Schwab are intended to help Entrust Investment Services manage and further develop its business enterprise. The benefits received by Entrust Investment Services or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Charles Schwab. As part of its fiduciary duties to clients, Entrust Investment Services endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Entrust Investment Services or its related persons in and of itself creates a conflict of interest and may indirectly influence the Entrust Investment Services' choice of Charles Schwab for custody and brokerage services.

- Directed Brokerage

Entrust Investment Services does not allow clients to direct brokerage.

- Best Execution

Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- Soft Dollar Arrangements

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Entrust Investment Services from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Entrust Investment Services receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of Entrust Investment Services. These benefits include both proprietary research from the broker and other research written by third parties. These are benefits to the firm because the firm does not have to produce or pay for research, products or services.

A conflict of interest exists when Entrust Investment Services receives soft dollars. The firm may have an incentive to select or recommend a broker-dealer based on the firm's interest in receiving the research or other products and services, rather than on the clients' interest in receiving the most favorable execution. However, this conflict is mitigated by the fact that Entrust Investment Services has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

Entrust Investment Services utilizes the services of custodial broker dealers. Economic benefits are received by Entrust Investment Services which would not be received if Entrust Investment Services did not give investment advice to Clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Entrust Investment Services' accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from

Client accounts.

## **Aggregating Securities Transactions for Client Accounts**

Entrust Investment Services is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Entrust Investment Services. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13:

## **REVIEW OF ACCOUNTS**

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Accounts reviews are performed quarterly by the Chief Compliance Officer, Kyle J. McCauley of Entrust Investment Services. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target bands of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

### **Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly for managed accounts and are issued by the custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Clients have access to their individual performance prepared by Black Diamond, through their online portal.

Item 14:

## CLIENT REFERRALS AND OTHER COMPENSATION

### Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

As disclosed under Item 12 above, Entrust Investment Services receives an economic benefit from Charles Schwab in the form of the support products and services it makes available to Entrust Investment Services and other independent investment advisors that have their clients maintain accounts at Charles Schwab. These products and services, how they benefit Entrust Investment Services, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to Entrust Investment Services of Charles Schwab's products and services is not based on Entrust Investment Services giving particular investment advice, such as buying particular securities for its clients.

### Advisory Firm Payments for Client Referrals

Entrust Investment Services does not pay for client referrals.

Item 15:

## CUSTODY

### Account Statements

Entrust Investment Services does not maintain custody of client funds and/or securities. All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully review and compare the account statements received directly from their custodians to any documentation or reports prepared by Entrust Investment Services.

Entrust Investment Services is deemed to have constructive custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Entrust Investment Services. Pursuant to CCR Section 260.237(b)(3). (CCR Section 260.238(b)(3) is a California code and may not apply to states other than California.)

- A. The investment adviser has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its

advisory fee.

- B. The investment adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- C. Each time a fee is directly deducted from a Client account, the investment adviser concurrently:
  - i. Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
  - ii. Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.
- D. The investment adviser notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided in this paragraph (b)(3). Such notification is required to be given on Form ADV.

Item 16:

## INVESTMENT DISCRETION

### Discretionary Authority for Trading

Entrust Investment Services requires discretionary authority to manage securities accounts on behalf of Clients. Entrust Investment Services has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Entrust Investment Services discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Entrust Investment Services allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Entrust Investment Services in writing.

Item 17:

## VOTING CLIENT SECURITIES

### Proxy Votes

Entrust Investment Services does not vote proxies on securities. Clients are expected to

vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent. Entrust Investment Services personnel may answer client questions regarding proxy- voting matters in an effort to assist the client in determining how to vote the proxy. However, the final decision of how to vote the proxy rests with the client. Client may call Entrust Investment Services at 248-905-1676 with questions.

Item 18:

## FINANCIAL INFORMATION

### **Balance Sheet**

A balance sheet is not required to be provided because Entrust Investment Services does not serve as a custodian for client funds or securities and Entrust Investment Services does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Entrust Investment Services has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither Entrust Investment Services, nor any management have had any bankruptcy filings in the last 10 years.



## SUPERVISED PERSON BROCHURE

Form ADV Part 2B

Kyle Jackson McCauley,  
APMA® CRPC®

Entrust Investment Services, Inc

115 Michael Rd.  
Lapeer, MI 48446  
248-905-1676

[www.entrustinv.com](http://www.entrustinv.com)

[kylemccauley@entrustinv.com](mailto:kylemccauley@entrustinv.com)

April 1, 2023

This brochure supplement provides information about Kyle Jackson McCauley and supplements the Entrust Investment Services, LLC brochure. You should have received a copy of that brochure. Please contact Kyle Jackson McCauley if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Kyle Jackson McCauley (CRD #6309847) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

### Kyle Jackson McCauley

Year of birth: 1986

### Educational Background and Business Experience:

#### EDUCATIONAL BACKGROUND:

- Harding University; Bachelor of Arts, Psychology; 2009

Kyle Jackson McCauley has earned certifications and credentials that are required to be explained in further detail.

Accredited Portfolio Management Advisor<sup>SM</sup> (APMA<sup>®</sup>): Accredited Portfolio Management Advisor is a designation granted by the college for Financial Planning. Individuals who hold the APMA<sup>®</sup> designation have completed a course of study encompassing Client assessment and suitability, risk/return, investment objectives, bond and equity portfolios, modern portfolio theory and investor psychology. Students have hands-on practice in analyzing investment policy statements, building portfolios, and making asset allocation decisions including sell, hold, and buy decisions within a Client's portfolio. Additionally, individuals must pass an end-of-course examination that tests the ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC<sup>®</sup>): Chartered Retirement Planning Counselor is a designation granted by the College for Financial Planning. CRPC<sup>®</sup> certification requirements:

- Successfully complete the program.
- Pass the final exam.
- Comply with the Code of Ethics.

- When you achieve your CRPC® designation, you must complete 16 hours of continuing education.
- Reaffirm to abide by the Standards of Professional Conduct.
- Pay a biennial renewal fee.

National Social Security Advisor Certificate Holder: Certification is awarded by National Social Security Association, LLC, candidates must:

- Complete an eight-hour educational course from an authorized educational provider encompassing social security benefits and options.
- Pass an exam administered by The National Underwriter Company. Minimum test score 75%.
- Renew certification bi-annually. Sixteen hours of continuing education is required for renewal.

#### BUSINESS EXPERIENCE:

- Entrust Investment Services, LLC; Owner, CCO, Insurance Agent; 01/01/2022 - Present
- Green Pastures CSA, LLC; Owner; 04/2022 – Present
- City Center Advisors, LLC formerly Keystone Financial Partners, Inc.; Member/Investment Advisor Representative; 12/2018 – Present
- City Center Financial, LLC; Managing Partner/Insurance Agent; 01/2016 – 12/26/2022
- CoreCap Advisors, Inc.; Investment Advisor Representative; 04/2016 – 12/2018
- M&O Marketing; National Sales Consultant; 08/2014 – 12/2015
- Minnesota Life; Insurance Agent; 03/2014 – 08/2014
- Securian Financial Services Inc.; Registered Representative; 03/2014 – 08/2014
- Heritage Financial Services Inc.; Financial Advisor; 03/2014 – 08/2014
- ACE Rent-to-Own; Store Manager; 03/2011 – 03/2014

#### Disciplinary Information

- A. Mr. McCauley **has never been involved** in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false

statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;

2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Mr. McCauley **never** had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

C. Mr. McCauley has **never** been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

## Other Business Activities Engaged In

Kyle McCauley has a financial industry affiliated business as a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Mr.

McCauley receives commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and Mr. McCauley's fiduciary obligation to act in the best interest of his clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Mr. McCauley is an Investment Advisor Representative of City Center Advisors, LLC. This firm is Mr. McCauley's former Registered Investment Advisory Firm, and it is intended that he will no longer be an Investment Advisory Representative before December 31, 2023.

Mr. McCauley is owner of Green Pastures CSA, LLC. This is not investment related and there will not be a conflict of interest as there will not be any crossover clients.

### **Additional Compensation**

Mr. McCauley receives additional compensation in his capacity as an insurance agent.

### **Supervision**

Mr. McCauley is the Chief Compliance Officer of Entrust Investment Services, LLC. As such, he is responsible for supervision and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firms' compliance manual.

On matters of compliance, Mr. McCauley can be reached at [compliance@entrustinv.com](mailto:compliance@entrustinv.com) or 248-905-1676.



## SUPERVISED PERSON BROCHURE

Form ADV Part 2B

**Robert Antonio Trejo**

RFC® CFF® CTST™

Entrust Investment Services, Inc

1901 S Bascom Ave, Suite 1150  
Campbell, CA 95008  
248-905-1676

[www.entrustinv.com](http://www.entrustinv.com)

[rtrejo@entrustinv.com](mailto:rtrejo@entrustinv.com)

April 1, 2023

This brochure supplement provides information about Robert Antonio Trejo and supplements the Entrust Investment Services, LLC brochure. You should have received a copy of that brochure.

Please contact Robert Antonio Trejo if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Antonio Trejo (CRD #6050826) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

### **Robert Antonio Trejo**

Year of birth: 1978

### **Educational Background and Business Experience:**

#### EDUCATIONAL BACKGROUND:

- No Higher Education Degrees after High School

Robert Antonio Trejo has earned certifications and credentials that are required to be explained in further detail.

Certified Financial Fiduciary® (CFF®): Financial professionals seeking to obtain the Certified Financial Fiduciary designation must meet the following criteria:

- Successfully complete 1 day in-person training at one of our training facilities or locations, or a live webinar class, or complete the self-paced online training course.
- Pass the CFF exam with score of 75% or better.
- Candidate must meet one of the following prerequisites:
  - Possess a professional financial certification/designation or
  - Professional financial license (securities, insurance, accounting, etc.), or
  - A combination of education and experience deemed satisfactory by the NACFF Advisory Council
- Must pass full background check and be in good standing with all state and federal license requirements
- Allow NACFF to audit/review their business office (via survey) for best practices and compliance.
- Exemplify highest standards of morals, ethics, and fiduciary standards of service
- Must swear to uphold the CFF code of conduct

Certified Tax Specialist™ (CTS): The CTS™ designation is the first of its kind in the industry and has proven effective in helping reducing clients' tax obligations. With CTS™ knowledge and strategies, you can offer expert guidance on

- who must file an income tax return
- the impact of current tax regulations on individuals, couples, families, and business owners
- business income and home businesses
- tax credits, itemized deductions, and retirement plans
- LLCs and S corporations

Registered Financial Consultant (RFC®) The Registered Financial Consultant (RFC®) is a professional designation awarded by the IARFC to financial consultants who meet the high standards of education, experience, and ethics.

- Experience Requirement
  - A minimum of three years of experience as a full-time practitioner in financial planning or financial services is required.
- Education Requirement
  - ONE OF THE FOLLOWING to satisfy the education requirement:
    - One of the following professional designations: AAMS®, CFA, CFP®, ChFC®, CLU®, CPA, EA, LUTCF®.
    - A Series 65 Securities license or one of the following combinations: Series 6 & 63, Series 6 & 66, Series 7 & 63, Series 7 & 66.
    - Life Insurance license.
    - A Bachelors' or advanced degree in Business, Finance, Economics, or a related field.
- Licensing Requirement
  - Applicants must have all the required licenses necessary for their mode of practice.
- Conduct Requirement
  - Applicants must have a sound record of business integrity with no

suspension or revocation of any professional designations or licenses.

Must be in good standing with all licensing bodies and organizations.

- Ethic Requirement
  - Applicants must wholeheartedly subscribe and adhere to the IARFC Code of Ethics found at: <https://www.iarfc.org/pdf/Code%20of%20Ethics.pdf>
- Application & Fee Requirement
  - Complete the application in its entirety and submit the appropriate application fee.
- Continuing Education Requirement
  - All RFC® designated members must agree to devote a minimum of 40 units every two years of professional Continuing Education in the field of personal finance and professional practice management. Four units every two years must be devoted to ethics
- Re-Certification Requirement
  - Annually provide assurance of continued compliance and operation.

National Social Security Advisor Certificate Holder: Certification is awarded by National Social Security Association, LLC, candidates must:

- Complete an eight-hour educational course from an authorized educational provider encompassing social security benefits and options.
- Pass an exam administered by The National Underwriter Company. Minimum test score 75%.
- Renew certification bi-annually. Sixteen hours of continuing education is required for renewal.

#### BUSINESS EXPERIENCE:

- Entrust Investment Services, Inc; Owner; Principle; 04/01/2023 - Present
- Coeus Financial & Insurance Services, Inc.; Managing Director; 07/2013 – Present
- Emerald Blue Advisors; Investment Advisor Representative; 11/2018 – Present
- Client One Securities, LLC; Investment Advisor Representative; Broker; 04/2018 – 12/2018
- Pluris Financial; Insurance Agent; 01/2007 – 07/2013

## Disciplinary Information

- D. Mr. Trejo **has never been involved** in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; or
  3. Was found to have been involved in a violation of an investment-related statute or regulation; or
  4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- E. Mr. Trejo **never** had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
- (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- F. Mr. Trejo **has never** been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
  2. Was found to have been involved in a violation of the SRO’s rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related

activities; or (c) fined more than \$2,500.

## **Other Business Activities Engaged In**

Robert Trejo has a financial industry affiliated business, Coeus Financial & Insurance Services, Inc., and is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Mr. Trejo receives commissions from insurance companies on the products sold.

These practices represent conflicts of interest because they give an incentive to recommend products/services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and Mr. Trejo's fiduciary obligation to act in the best interest of his clients and will act in accordance with those responsibilities. Clients have the right to purchase these products/services through another insurance agent of their choosing.

Mr. Trejo is an Investment Advisor Representative of Emerald Blue Advisors. This firm is Mr. Trejo's former Registered Investment Advisory Firm, and it is intended that he will no longer be an Investment Advisory Representative before December 31, 2023.

## **Additional Compensation**

Mr. Trejo receives additional compensation in his capacity as an insurance agent.

## **Supervision**

Mr. Trejo is supervised by the Chief Compliance Officer of Entrust Investment Services. As such he is supervised and monitored in relationship to the investment advice he offers to clients. He will adhere to the policies and procedures as described in the firms' compliance manual.

On matters of compliance, Entrust Investment Services Compliance Department can be reached at [compliance@entrustinv.com](mailto:compliance@entrustinv.com) or 248-905-1676.