



Form ADV Part 2A Brochure

February 18, 2026

This brochure provides information about the qualifications and business practices of 57 West Capital Advisors, Inc. (hereinafter 57WCA) and its investment adviser representatives. If you have any questions about the contents of this brochure, please contact Luis Giraldo at (833) 457-5757 or email us at: compliance@57west.us

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. Registration of an investment adviser does not imply any level of skill or training.

Additional information about 57 West Capital Advisors, Inc., CRD# 115378, and our Investment Advisor Representatives (IARs) is available on the SEC's website at: www.adviserinfo.sec.gov Our Firm has Investment Advisor Representatives: Juan Gabriel Garcés, Taylor Michael Tucker, Sebastián Caicedo, Luis Giraldo and Debbie Lux.

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ITEM 2 – MATERIAL CHANGES

This section will contain any amendments or material changes to our ADV Part 2 from our last annual update filing on March 21, 2025.

Sebastian Caicedo has replaced Juan Garces as CEO of 57WCA.

ITEM 3 - TABLE OF CONTENTS

ITEM 1 - Cover Page..... 1

ITEM 2 - Material Changes..... 2

ITEM 3 - Table of Contents..... 3

ITEM 4 - Advisory Business..... 4

ITEM 5 - Fees & Compensation..... 4

ITEM 6 - Performance-Based Fees and Side by Side Management..... 5

ITEM 7 - Types of Clients..... 5

ITEM 8 - Methods of Analysis, Investment Strategies and Risk of Loss..... 5

ITEM 9 - Disciplinary Information..... 9

ITEM 10 - Other Financial Industry Activities and Affiliations..... 9

ITEM 11 - Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading..... 9

ITEM 12 - Brokerage Practices..... 10

ITEM 13 - Review of Accounts..... 10

ITEM 14 - Client Referrals & Other Compensation 11

ITEM 15 - Custody..... 11

ITEM 16 - Investment Discretion 11

ITEM 17 - Voting Client Securities..... 11

ITEM 18 - Financial Information..... 12

ITEM 19 - Requirements for State-Registered Advisers..... 12

ITEM 4 – ADVISORY BUSINESS

57 West Capital Advisors, Inc. (hereinafter "57WCA") is a state registered investment advisory company specializing in managing equity portfolios. The company is 100% owned by 57 West Capital Holdings, Inc., a Texas-based investment and holding company. Juan Gabriel Garcés is the principal owner of the holding company. All other shareholders individually hold less than 25% of its stock. 57 West Capital Holdings, Inc. also owns and manages 57 West Capital Markets, Ltd., an offshore investment company.

57WCA is an investment advisory company specializing in managing equity portfolios. The investment goal of 57WCA is to invest all the assets of a client's account in equities and to hold them long term. This investment style is considered high risk as equities and equity portfolios may fluctuate widely in value. The investment strategy of the advisor is to invest in a diversified number of companies eventually holding investments in a multiple number of companies; typically, over 10 but depending on the size of the portfolio investments can number up to 100 or more companies' shares held. Investment time horizons are over 6 years and ideally span into decades.

Based on 57WCA's proprietary selection and valuation process, the advisor selects companies it believes are good investment options and purchases them at times and prices it believes are advantageous for clients' portfolios. Since the investment advisor only seeks to invest when it considers it advantageous for clients, actual full investment of a client's funds can take many years. While not invested in equities, money in client accounts is invested in fixed income securities with short-term maturities, such as, money market accounts, bank certificates of deposit, treasuries, bonds, corporate and municipal bonds and repurchase agreements of securities among others or held in cash.

57WCA tailors investment portfolios to particular client needs through the selection and evaluation of specific equities. Clients can impose restrictions

as to the selection of equities and margin loan levels on their accounts.

57WCA provides both discretionary and non-discretionary investment advisory services to its clients through various managed account programs. Discretionary trading authority gives us the ability to trade on a client's behalf with that authorization only obtained when a client executes their Investment Advisory Agreement. No subsequent trades on a client's behalf require their prior approval. The firm does not participate in a Wrap Fee Program.

As of January 31st, 2026, 57WCA had a total of \$47,379,902 in discretionary managed accounts and \$0 in non-discretionary accounts.

ITEM 5 – FEES AND COMPENSATION

57WCA charges fees in arrears based on daily or monthly closing values of assets in each account. All fees are subject to negotiation and the specific percentage charged is stipulated in the written agreement between each client and the advisory company. Depending on the value of the account, complexity, specific needs, and geographic location of each client, fees can range from 1.5% to 1.75% of the asset value per year.

To calculate fees on a daily basis, the annual percentage fee is divided by the actual trading days in that year and multiplied by each day's ending balance in the account.

To calculate the fees in arrears on a monthly basis, at the end of each month the net closing value of the account is multiplied by the annual percentage fee according to each contract and then divided by 12 (since there are 12 months in the year and the fees are calculated on a monthly basis).

For payment method, clients can select to either deduct the fees directly from their account or make payment by check or wire transfer. Management fees are prorated to take into account capital withdrawals or contributions within a given month by taking the daily closing balance and dividing that number by the days in that month.

In addition to 57WCA's management fees, clients will incur additional direct or indirect costs and fees on their accounts such as commissions, interest, custodial fees, taxes, mutual fund management fees and expenses, brokerage fees, as well as other general expenses. Additional information about brokerage commissions, fees and transactions are provided below under item 12- Brokerage Practices. Neither 57WCA nor its investment adviser representatives receive any economic benefit from these additional expenses incurred by client accounts.

57WCA does not have prepayment arrangements of fees with clients on the accounts it manages.

Negotiability of Fees: We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

CCR Section 260.238(j) Disclosure: Lower fees for comparable services may be available from other sources.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal to any specific performance level(s).

Termination: Clients may terminate investment advisory services obtained from 57WCA, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with 57WCA. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by 57WCA. Clients who terminate investment advisory services during a month are charged a prorated advisory fee based on the date of 57WCA's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable, and any prepaid and unearned fees will be immediately refunded.

The fee schedule for asset management is as follows:

Total Account Value	Maximum Annual Advisory Fee
Under \$2,000,000	1.75%
Over \$2,000,000	1.50%

Neither 57WCA nor any of the firm's supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

ITEM 6 – PERFORMANCE BASED COMPENSATION

57WCA does not charge performance-based compensation.

ITEM 7 – TYPES OF CLIENTS

57WCA provides portfolio management services to individuals and investment companies such as mutual funds and corporations.

The minimum amount required for opening an account is \$100,000 dollars. This requirement may be waived when a client commits to depositing a pre-determined amount into their account on an annual basis.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

57WCA specializes in equity portfolios. The investment goal of 57WCA is to invest all the assets of a client's account in equities and to hold them over the long term. Trading in client accounts is therefore not frequent. This investment style is considered high risk as equities and equity portfolios may fluctuate widely in value. Investing in securities involves a risk of loss that clients should be prepared to bear.

The investment strategy of the advisor is to invest in a diversified number of companies eventually holding investments in shares and securities issued by a plural number of companies. Client portfolios, when fully invested, will hold shares and securities issued by up to 100 or more different companies or institutions. For the most part shares of individual companies are purchased; the advisor prefers not investing in shares of mutual funds or other similar investment vehicles. Investment time horizons are usually over 6 years and ideally span into decades.

Based on 57WCA's proprietary selection and valuation process, the advisor selects companies it believes are good investment options and purchases them at times and prices it believes are advantageous for client portfolios. Since the investment advisor only seeks to invest when it considers it advantageous for clients, actual full investment of a client's funds can take many years depending on economic circumstances. While not invested in equities, money in client accounts is invested in fixed income securities with short term maturities such as money market accounts, bank certificates of deposit, treasuries, bonds, corporate and municipal bonds and repurchase agreements of securities. Additionally, 57WCA may purchase options selectively for hedging purposes when it believes it is prudent to do so. While 57WCA works to achieve its goals, the firm makes no guarantee that it will obtain the desired results.

Given 57WCA's unique focus on equity portfolios, the firm's advisor serving a given account meets with his client to ensure that the advisor's services, strategy, and investment philosophy are compatible and suitable in regard to the capital or portion of capital a client is entrusting to the advisor. It is noted that since 57WCA is focused on equities, clients could miss other types of investments which could prove to be more profitable or stable during any given period.

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value

of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

Preferred Securities Risk: Preferred Securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy.

Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the issuer's after-tax profits, while bond interest is paid before taxes.

Inverse Funds: Inverse mutual funds and ETFs, which are sometimes referred to as "short" funds, seek to provide the opposite of the single-day performance of the index or benchmark they track. Inverse funds are often marketed as a way to profit from, or hedge exposure to, downward moving markets. Some inverse funds also use leverage, such that they seek to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (i.e., -200%, -300%). In addition to leverage, these funds may also use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant losses.

Leveraged ETFs or Funds: Leveraged investment vehicles seek to increase exposure to any given security, index or collection of securities. Through the use of leverage, they seek to achieve a return that is a multiple of the performance of the underlying security, index or benchmark (i.e., +200%, +300%). In addition to leverage, these funds may also use derivative instruments to accomplish their objectives. As such, these investment vehicles or funds are highly volatile and provide the potential for significant losses.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse

consequences for such entities and may cause a client's investment in such entities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

Recommendation of Other Advisers: In the event we recommend a third-party investment adviser to manage all or a portion of your assets, we will advise you on how to allocate your assets among various classes of securities or third-party investment managers, programs, or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the third-party investment advisers and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a third-party investment adviser. The primary risk associated with investing with a third party is that while a particular third party may have demonstrated a certain level of success in the past; it may not be able to replicate that success in future markets. In addition, as we do not control the underlying investments in third-party model portfolios, there is also a risk that a third party may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek third parties with proven track records that have demonstrated a consistent level of performance and success over time. A third party's past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account.

Please refer to the third-party investment adviser's advisory agreements, Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

Cryptocurrency Risk: Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency", "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency as well as the ETFs and Mutual Funds that hold them are an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles.

Cryptocurrency operates without central authority or banks and is not backed by any government.

Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender.

Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice.

Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

Artificial Intelligence and Machine Learning Risk. Certain service providers utilized by the Firm to service client accounts have artificial intelligence components. The use of artificial intelligence and machine learning includes increased risk of data inaccuracies and security vulnerabilities. Due to the rapid advancement of machine learning technologies, future risks related to artificial intelligence are unpredictable. As a measure to mitigate these risks to our clients, the Firm performs periodic due diligence of our service providers for assurance that the service providers have appropriate controls in place to protect our clients' information and to limit data

inaccuracies when artificial intelligence is used by the service provider

ITEM 9 – DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report at this time for 57WCA, Sebastian Caicedo - CEO, Luis Giraldo – CCO, –Juan Gabriel Garcés – Investment Advisor, Taylor Tucker – Investment Advisor and Debbie Lux – Investment Advisor.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

57WCA is 100% owned by 57 West Capital Holdings, Inc., a holding company based in Texas. This holding company also holds investments in other companies which provide consultancy and advisory services to third parties, it also holds its own investment portfolios both directly and through its subsidiaries.

Juan Gabriel Garcés as president and officer of 57 West Capital Holdings, Inc. dedicates time to managing the affairs and business of that entity. Other activities represent no more than about one-third of the advisor's available work time. The advisor believes the above relationships may be complimentary to its obligations and do not constitute a material conflict of interest with clients.

Neither 57WCA, nor its representatives, are registered with any broker dealer. Neither 57WCA, nor its representatives, are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor. 57WCA does not recommend or select other investment advisors to our clients for which we receive compensation, directly or indirectly, from those advisors, nor do we have business relationships with any other investment advisors.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, & PERSONAL TRADING

57WCA requires of all its personnel compliance with all applicable securities laws, the laws of the United States, those of other jurisdictions where it operates as well as its own policies. The company has adopted and expanded written internal Policies & Procedures manual. For purposes of reviewing and ensuring compliance with these

laws and policies on a periodic basis 57WCA has designated an individual compliance officer responsible for this duty.

57WCA, its affiliates and its officers and employees sometimes acquire the same securities they recommend to clients. Additionally, they at times acquire securities not recommended to clients. The advisor's policy in any purchase or sale of securities where clients are involved is that client orders are executed first, ahead of any company proprietary account or that of any employee or officer. To assure compliance with this policy all officers and employees are required to disclose all trading occurring in all their personal accounts. The Compliance officer verifies the firm's adherence to this policy on a quarterly basis and keeps a record of all these transactions.

As a policy, 57WCA and its officers and employees are prohibited from acting as principal in transactions with clients. Neither the company nor its officers and employees may purchase or sell securities directly to clients from their own portfolios.

57WCA's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Luis Giraldo, CCO, at (833) 457-5757.

ITEM 12 – BROKERAGE PRACTICES

Other than execution of trades, 57WCA does not use information, research or any other services provided by client brokers in determining investment, trading and advisory decisions. Therefore, the advisor does not obtain economic benefits from the different brokers selected by clients. However, when clients open accounts with Charles Schwab & Co. or Interactive Brokers, the advisor has the facility of viewing and managing all the accounts from one platform facilitating the work and saving time in the actual reviews of the accounts and the execution of trades. 57WCA does not have any formal soft dollar arrangements.

57WCA does not receive client referrals from broker-dealers in exchange for cash or other

compensation, such as brokerage services or research.

Clients may direct 57WCA to use a specified broker-dealer other than the firm suggested by 57WCA. In these situations, it is up to the client to negotiate the commission rate, as 57WCA will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker-dealer used by 57WCA. On the other hand the client may be able to obtain more favorable expense rates for their accounts. Additionally, the client will not be able to participate in any block trades placed by the firm. Where the client does not otherwise designate a broker-dealer, 57WCA may suggest a broker-dealer.

While individual client advice is provided to each account, client trades may be executed as a block trade. 57WCA suggests to its existing and new clients to use Charles Schwab or Interactive Brokers. Typically, only accounts in the custody of Charles Schwab & Co. or Interactive Brokers Inc. would have the opportunity to participate in aggregated securities transactions. When appropriate, trades using Charles Schwab & Co. or Interactive Brokers Inc. will be aggregated and done in the name of 57WCA. The executing broker will be informed that the trades are for the account of 57WCA's clients and not for 57WCA itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. On average, the aggregation may reduce or increase the costs of execution. Charles Schwab & Co. or Interactive Brokers Inc. will be notified of the amount of each trade for each account.

ITEM 13 – REVIEW OF ACCOUNTS

Client accounts are reviewed annually by Sebastian Caicedo and Luis Giraldo. Portfolios and holdings may be reviewed on other than a periodic basis when the advisor subjectively considers it beneficial to do so due to changes in market valuations or new developments in a company's business.

Clients receive written monthly statements, with an evaluation of their portfolio performance as compared to a selected index or benchmark selected by 57WCA.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

57WCA pays for referrals to persons both in the United States and in foreign countries. These persons are not supervised by the company. The firm is committed to not engaging referrals from individuals from blacklisted countries as per the Financial Action Task Force (FATF). In cases where 57WCA is involved with overseas operations, the rules and regulations of that country will be observed.

57WCA will compensate investment advisor representatives who may or may not be supervised by the company for referrals.

Some marketing expenses may be recognized in addition to a percentage of the fees generated by clients that both Investment Advisor Representatives and third-party solicitors bring to the firm on a monthly basis. This arrangement is stated in the written agreement between the advisor and each client when applicable, and the client has the option of accepting or declining payment of the referral fee. A client may withdraw authorization of payment for the above-mentioned referrals by submitting a 30-day notice.

ITEM 15 - CUSTODY

57WCA is deemed to have limited, or constructive, custody of client funds and securities because of the fee deduction authority granted by the client in the investment advisory agreement. We maintain safeguards in accordance with regulatory requirements regarding custody of client assets.

57WCA has written authorization from the client to deduct advisory fees from the account held with the qualified custodian. Each time a fee is directly deducted from a client account, the investment adviser concurrently:

- Sends the qualified custodian an invoice or statement of the amount of the fee to

be deducted from the client's account; and

- 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.

You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian. 57WCA also sends monthly invoices detailing the manner and amount of advisory fees to all clients.

57WCA notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided in this section.

For clients domiciled in Florida only: 57WCA also sends invoices detailing the manner and amount of advisory fees to all clients.

ITEM 16 – INVESTMENT DISCRETION

57WCA only accepts opening client accounts with discretionary authority. Discretionary authority allows the firm to buy or sell securities on your behalf, without obtaining your consent to approval prior to each transaction. In order for the advisor to have discretionary authority over a client account the client previously needs to sign a limited power of attorney. This authorization is also stated in the written agreement between the advisor and each client. In the written agreement a client may limit the authorization in regards to the types of investments the advisor may carry out in the account. Customarily few if any restrictions have been placed on the advisor.

ITEM 17 – VOTING CLIENT SECURITIES

As a matter of firm policy and practice, 57WCA and its advisors do not have any authority to and do not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. The advisor for a given account may provide advice to clients regarding the

clients' voting of proxies when requested by a client or when at its sole discretion it deems it important to do so.

ITEM 18 – FINANCIAL INFORMATION

57WCA does not solicit prepayments or upfront fees of any kind. 57WCA and its Principal Executive Officers have no financial commitments which impair their ability to meet their advisory agreements and obligations to clients.

ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

Sebastian Caicedo Managing Principal/CEO

Educational Background:

- College Degree in Industrial Engineering from: Los Andes University
- Emphasis on Finance and Organizations

Business Background for the Previous 10 Years:

- 57WCA –Managing Director/CEO - 1/2024 to Present.
- 57WCA - Senior research Analyst / Investment Advisor Representative – 01/2022 to 01/2024
- 57WCA - IAR - 03/2022 to Present
- Caicedo Posada Asociados - New Projects Manager - 09/2019 to 12/2021
- Marsh & McLennan - Commercial Manager - Multinationals - 05/2019 to 09/2019
- District Secretariat of Habitat of Bogota - Equis y Zeta Estrategias LTDA - Project Manager - 08/2017 to 05/2019
- Los Andes University - Student - 2012 to 2017

Luis Giraldo Managing Principal/CCO

Educational Background:

- Master of Science in Industrial Engineering and Operations Research from: University of Texas at Austin
- MBA from: ICESI, Colombia
- Bachelor of Science in Chemical Engineering from: University of Valle, Colombia

Business Background for the Previous 10 Years:

- 57WCA – Manager Director and CCO - 01/2024 to Present.

- Treis Investments Inc. - Chairman of the Board - 07/2022 to Present.
- Innovated Freezing Systems S.A.S – Chairman of the Board – 11/2022 to Present.
- Intelligraphics – Vice President - 01/2004 to 06/2022

Neither 57WCA nor any of its management persons have any relationships or arrangements with any issuers of securities.

Neither 57WCA nor any of its supervised persons charge performance-based fees.

Juan Gabriel Garcés, Taylor Michael Tucker and Debbie Lux are the only additional state registered advisers for 57WCA. They dedicate between 80% and 100% of their time to providing services for 57WCA. The rest of their time is spent on personal business matters, not related to the activities of 57WCA.

No management person at 57WCA has been involved in any of the events listed below:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:
 1. (a) an investment or an *investment-related* business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:
 1. (a) an investment or an *investment-related* business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;

4. (d) bribery, forgery, counterfeiting, or extortion; or
5. (e) dishonest, unfair, or unethical practices.

57WCA has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business.

All material conflicts of interest have been disclosed in this document.



Form ADV Part 2B – Brochure Supplement

February 18, 2026

This Brochure Supplement provides information about Juan Gabriel Garcés, that supplements 57 West Capital Advisors, Inc.'s (hereinafter "57WCA") Investment Brochure. You should have received a copy of that Brochure. Please contact our office at 833-457-5757 if you did not receive our brochure or if you have any questions about the contents of this supplement.

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

Juan Gabriel Garcés

CRD#: 4614691

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EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Juan Gabriel Garcés
Year of Birth: 1954

Business Background for the Previous 10 Years:

- 57WCA – Investment Advisor Representative - 01/99-Present
- 57WCA - Chief Compliance Officer - 01/1999 to 12/2022
- 57 West Capital Holdings, Inc. - President and Board Member - 06/1998 to Present
- 57 West Capital Markets, Inc – President and Board Member since 02/2022
- 57 West Capital Markets, Ltd.- President and Board Member since 10/2021
- 57 West Capital Overseas, Ltd. – President and Board Member since 10/2021

DISCIPLINARY INFORMATION - ITEM 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Juan Gabriel Garcés and 57WCA. Mr. Garcés has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Mr. Garcés is the President of 57 West Capital Holdings, Inc, a Texas based corporation which owns 100% of 57WCA. This holding company also holds investments in other companies which provide consultancy and advisory services to third parties, it also holds its own investment portfolios both directly and through its subsidiaries.

Juan Gabriel Garcés dedicates about two-thirds of his time to activities related to 57WCA. In addition, the remaining one-third of his time is dedicated to managing 57 West Capital Holdings, Inc., and its subsidiaries.

Mr. Garcés does not have any other financial industry relationship or arrangement that is material to our advisory business or to our clients.

ADDITIONAL COMPENSATION – ITEM 5

Mr. Garcés does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

SUPERVISION - ITEM 6

The Chief Compliance Officer (CCO) of 57WCA, Luis Giraldo, is responsible for the implementation of the firm's compliance program. The CCO supervises Juan Gabriel Garces in his role as an investment adviser representative of 57WCA. In this role Mr. Garcés is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Giraldo can be reached at (512) 284-4405.

57WCA has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. Mr. Garcés adheres himself to 57WCA's Code of Ethics and compliance manual as mandated. Clients may contact Mr. Garcés at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of 57WCA's Code of Ethics.

Additionally, 57WCA is subject to regulatory oversight by various agencies. These agencies require registration by 57WCA and its employees. As a registered entity, 57WCA is subject to examinations by regulators, which may be announced or unannounced. 57WCA is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

A. Mr. Garcés has not been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;

3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.

B. Mr. Garcés has not been subject to a bankruptcy petition.



Form ADV Part 2B – Brochure Supplement

February 18, 2026

This Brochure Supplement provides information about Sebastián Caicedo, that supplements 57 West Capital Advisors, Inc.'s (hereinafter "57WCA") Investment Brochure. You should have received a copy of that Brochure. Please contact our office at 833-457-5757 if you did not receive the brochure or if you have any questions about the contents of this supplement.

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

Sebastián Caicedo

CRD#: 7511890

57WCA

11615 Angus Rd. Ste. 104-K
Austin, TX 78759

Phone: 833-457-5757

Email: sc@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Sebastián Caicedo
Year of Birth: 1993

Educational Background:

- College Degree in Industrial Engineering from: Los Andes University
- Emphasis on Finance and Organizations

Business Background for the Previous 10 Years:

- 57WCA –Managing Director/CEO - 1/2024 to Present.
- 57WCA - Senior research Analyst / Investment Advisor Representative – 01/2022 to 01/2024
- 57WCA - IAR - 03/2022 to Present
- Caicedo Posada Asociados - New Projects Manager - 09/2019 to 12/2021
- Marsh & McLennan - Commercial Manager - Multinationals - 05/2019 to 09/2019
- District Secretariat of Habitat of Bogota - Equis y Zeta Estrategias LTDA - Project Manager - 08/2017 to 05/2019
- Los Andes University - Student - 2012 to 2017

DISCIPLINARY INFORMATION - ITEM 3

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Sebastián Caicedo and 57WCA. Mr. Caicedo has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Mr. Caicedo is a board member of Caicedo Posada Asociados, a private Colombian company. This company's main purpose is the development of agricultural activities in its different branches, especially agricultural crops, on owned or leased land, leasing, purchase, sale, exchange, and administration. Beside the main purpose, this company is also involved in all kinds of negotiations on real estate, the purchase and sale and negotiation of all kinds of shares and other securities; participation in all kinds of companies, as partner or shareholder; the execution of the commercial representation contract.

Mr. Caicedo also dedicates about 20% of his time to activities related to 57 West Capital Holdings, Inc and its subsidiaries. This holding company also holds investments in other companies which provide consultancy and advisory services to third parties, it

also holds its own investment portfolios both directly and through its subsidiaries.

ADDITIONAL COMPENSATION – ITEM 5

Sebastián Caicedo does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

SUPERVISION - ITEM 6

The Chief Compliance Officer (CCO) of 57WCA, Luis Giraldo, is responsible for the implementation of the firm's compliance program. The CCO supervises Sebastián Caicedo in his role as an investment adviser representative of 57WCA. In this role Sebastián Caicedo is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Sebastián Caicedo is required to attend regular compliance meetings, in which employees are informed and educated about industry compliance topics and practices. Mr. Giraldo can be reached at (512) 284-4405.

57WCA has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. The CCO ensures all employees adhere to 57WCA's Code of Ethics and compliance manual as mandated. Clients may contact the CCO at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of 57WCA's Code of Ethics.

Additionally, 57WCA is subject to regulatory oversight by various agencies. These agencies require registration by 57WCA and its employees. As a registered entity, 57WCA is subject to examinations by regulators, which may be announced or unannounced. 57WCA is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

A. Sebastián Caicedo has not been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.

B. Sebastián Caicedo has not been subject to a bankruptcy petition.



Form ADV Part 2B – Brochure Supplement

February 18, 2026

This Brochure Supplement provides information about Luis Giraldo, that supplements 57 West Capital Advisors, Inc.'s (hereinafter "57WCA") Investment Brochure. You should have received a copy of that Brochure. Please contact our office at 833-457-5757 if you did not receive the brochure or if you have any questions about the contents of this supplement.

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

Luis Giraldo

CRD#: 7899557

57WCA

11615 Angus Rd. Ste. 104-K
Austin, TX 78759

Phone: 833-457-5757

Email: lgg@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Luis Giraldo
Year of Birth: 1958

Educational Background:

- Master of Science in Industrial Engineering and Operations Research from: University of Texas at Austin
- MBA from: ICESI, Colombia
- Bachelor of Science in Chemical Engineering from: University of Valle, Colombia

Business Background for the Previous 10 Years:

- 57WCA – Manager Director and CCO - 01/2024 to Present.
- Treis Investments Inc. - Chairman of the Board - 07/2022 to Present.
- Innovated Freezing Systems S.A.S – Chairman of the Board – 11/2022 to Present.
- Intelligraphics – Vice President - 01/2004 to 06/2022

DISCIPLINARY INFORMATION - ITEM 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Luis Giraldo and 57WCA. Mr. Giraldo has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Mr. Giraldo is a Board member of Treis Investments Inc., a family investment company based in Austin, TX. Mr. Giraldo is also a Board member of IFS, Innovated Freezing Systems S.A.S a company based in Ecuador, that manufactures and leases freezing tunnels for the food industry. He is also a Board Member of 57 West Capital Holdings Inc., a Texas-based corporation which owns 100% of 57WCA. This holding company also holds investments in other companies which provide consultancy and advisory services to third parties, it also holds its own investment portfolios both directly and through its subsidiaries.

Mr. Giraldo also dedicates about 70% of his time to activities related to 57 West Capital Holdings, Inc., and its subsidiaries.

ADDITIONAL COMPENSATION – ITEM 5

Luis Giraldo does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

SUPERVISION - ITEM 6

The Chief Compliance Officer (CCO) of 57WCA, Luis Giraldo, is responsible for the implementation of the firm's compliance program. In his capacity of Chief Compliance Officer, Mr. Giraldo is committed to uphold the rules and regulations of 57WCA's Policies and Procedures Manual and will abide by these rules as well as pertinent regulations as promulgated by the Texas State Securities Board. Any employee can raise a concern over CCO misconduct and directly to the President of the firm. Mr. Giraldo can be reached at (512) 284-4405.

In his role as an Investment Advisor Representative, Luis Giraldo is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Luis Giraldo is required to attend regular compliance meetings, in which employees are informed and educated about industry compliance topics and practices.

57WCA has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. The CCO ensures all employees adhere to 57WCA's Code of Ethics and compliance manual as mandated. Clients may contact the CCO at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of 57WCA's Code of Ethics.

Additionally, 57WCA is subject to regulatory oversight by various agencies. These agencies require registration by 57WCA and its employees. As a registered entity, 57WCA is subject to examinations by regulators, which may be announced or unannounced. 57WCA is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

A. Luis Giraldo has not been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;

3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.

B. Luis Giraldo has not been subject to a bankruptcy petition



Form ADV Part 2B – Brochure Supplement

February 23, 2026

This Brochure Supplement provides information about Debbie Lux, that supplements 57 West Capital Advisors, Inc.'s (hereinafter "57WCA") Investment Brochure. You should have received a copy of that Brochure. Please contact our office at 833-457-5757 if you did not receive the brochure or if you have any questions about the contents of this supplement.

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

Debbie Lux

CRD#: 8176421

57WCA

8373 Zanzibar Lane
Wellington, FL 33414

Phone:

Email: dl@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Debbie Lux
Year of Birth: 1964

Educational Background:

- Bachelor of Science in Finance from: The American University

Business Background for the Previous 10 Years:

- 57WCA – Relationship Manager - 09/2025 to Present.
- Floor City, LLC - Officer - 02/2021 to 09/2025.
- Servepro of Deerfield Beach – Officer/Manager – 04/2015 to 02/2021.

DISCIPLINARY INFORMATION - ITEM 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Luis Giraldo and 57WCA. Ms. Lux has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Ms. Lux is Co-Owner of Floor City, LLC, a non-investment related flooring installation and general remodeling company based in Wellington, FL. Ms. Lux spends less than 10% of her time engaged in duties related to the company.

ADDITIONAL COMPENSATION – ITEM 5

Debbie Lux does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

SUPERVISION - ITEM 6

The Chief Compliance Officer (CCO) of 57WCA, Luis Giraldo, is responsible for the implementation of the firm's compliance program. In his capacity of Chief Compliance Officer, Mr. Giraldo is committed to uphold the rules and regulations of 57WCA's Policies and Procedures Manual and will abide by these rules as well as pertinent regulations as promulgated by the Texas State Securities Board. Any employee can raise a concern over CCO misconduct and directly to the President of the firm. Mr. Giraldo can be reached at (512) 284-4405.

In her role as an Investment Advisor Representative, Debbie Lux is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Debbie Lux is required to attend regular compliance meetings, in which employees are informed and educated about industry compliance topics and practices.

57WCA has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. The CCO ensures all employees adhere to 57WCA's Code of Ethics and compliance manual as mandated. Clients may contact the CCO at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of 57WCA's Code of Ethics.

Additionally, 57WCA is subject to regulatory oversight by various agencies. These agencies require registration by 57WCA and its employees. As a registered entity, 57WCA is subject to examinations by regulators, which may be announced or unannounced. 57WCA is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

A. Debbie Lux has not been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 1. (a) an investment or an investment-related business or activity;

2. (b) fraud, false statement(s), or omissions;
3. (c) theft, embezzlement, or other wrongful taking of property;
4. (d) bribery, forgery, counterfeiting, or extortion; or
5. (e) dishonest, unfair, or unethical practices.

B. Debbie Lux has not been subject to a bankruptcy petition



Form ADV Part 2B – Brochure Supplement

February 18, 2026

This Brochure Supplement provides information about Taylor M. Tucker, that supplements 57 West Capital Advisors, Inc.'s (hereinafter "57WCA") Investment Brochure. You should have received a copy of that Brochure. Please contact our office at 833-457-5757 if you did not receive the brochure or if you have any questions about the contents of this supplement.

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

Taylor M. Tucker
CRD#: 5941937

57WCA
11615 Angus Rd. Ste. 104-K
Austin, TX 78759

Phone: 833-457-5757
Email: tt@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Taylor M. Tucker
Year of Birth: 1988

Educational Background:

- College Degree in Finance from: Texas State University 2014
- Financial Technology Bootcamp: Rice University 2020

Business Background for the Previous 10 Years:

- 57WCA - IAR - 06/2018 to Present.
- 57WCA - Director of Operations - 09/2017 to 06/2025.
- New York Life Securities LLC - Registered Service Assistant - 03/2017 to 09/2017
- NE York Life Securities LLC - Financial Services Professional - 02/2015 to 03/2017
- Ralf Lauren Polo – Sales - 09/2013 to 03/2013

DISCIPLINARY INFORMATION - ITEM 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Taylor M. Tucker and 57WCA. Mr. Tucker has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Mr. Tucker does not have any financial industry relationship or arrangement that is material to our advisory business or to our clients.

ADDITIONAL COMPENSATION – ITEM 5

Taylor M. Tucker does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

SUPERVISION - ITEM 6

The Chief Compliance Officer (CCO) of 57WCA, Luis Giraldo, is responsible for the implementation of the firm's compliance program. The CCO supervises Taylor M. Tucker in his role as an investment adviser representative of 57WCA. In this Taylor M. Tucker is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Taylor M. Tucker is required to attend regular compliance meetings, in which employees are informed and educated about industry compliance topics and practices.

57WCA has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. The CCO ensures all employees adhere to 57WCA's Code of Ethics and compliance manual as mandated. Clients may contact the CCO at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of 57WCA's Code of Ethics. Mr. Giraldo can be reached at (512) 284-4405.

Additionally, 57WCA is subject to regulatory oversight by various agencies. These agencies require registration by 57WCA and its employees. As a registered entity, 57WCA is subject to examinations by regulators, which may be announced or unannounced. 57WCA is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets under management.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

A. Taylor M. Tucker has not been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 1. (a) an investment or an investment-related business or activity;
 2. (b) fraud, false statement(s), or omissions;

3. (c) theft, embezzlement, or other wrongful taking of property;
4. (d) bribery, forgery, counterfeiting, or extortion; or
5. (e) dishonest, unfair, or unethical practices.

B. Taylor M. Tucker has not been subject to a bankruptcy petition.