## **Item 1** Cover Page

# **Armis Financial, LLC**

106 E. Sixth Street, Suite 900
Austin, TX 78701
(512) 709-9741
www.armisfinancial.com
April 25, 2018

This Brochure provides information about the qualifications and business practices of Armis Financial, LLC ("Armis Financial", "us", "we", "our"). If you have any questions about the contents of this Brochure, please contact us at (512) 709-9741 or via email at <a href="mailto:david@armisfinancial.com">david@armisfinancial.com</a>. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Armis Financial is also available via the SEC's website <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Armis Financial is CRD#: 294890. The SEC's web site also provides information about any persons affiliated with Armis Financial who are registered, or are required to be registered, as Investment Adviser Representatives of Armis Financial.

Armis Financial is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Armis Financial ADV Part 2A April 18 Page 1 of 22

## **Item 2 - Material Changes**

This is a new adviser.

This Brochure, dated April 25, 2018 is a new document that describes the adviser's business.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year end which is December 31<sup>st</sup>. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting David Salazar at (512) 709-9741.

Armis Financial ADV Part 2A April 18 Page 2 of 22

# **Item 3 - Table of Contents**

tem 1 Cover Page	1
tem 2 – Material Changes	2
tem 3 – Table of Contents	3
tem 4 – Advisory Business Introduction	4
tem 5 – Fees and Compensation	7
tem 6 – Performance Based Fee and Side by Side Management	9
tem 7 – Types of Client(s)	10
tem 8 – Methods of Analysis, Investment Strategies and Risk of Loss	11
tem 9 – Disciplinary Information	15
tem 10 – Other Financial Industry Activities and Affiliations	15
tem 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading	15
tem 12 – Brokerage Practices	17
tem 13 – Review of Accounts	18
tem 14 – Client Referrals and Other Compensation	18
tem 15 – Custody	18
tem 16 – Investment Discretion	19
tem 17 – Voting Client Securities	19
tem 18 – Financial Information	19
tem 19 – Requirements for State Registered Advisers	20
ADV Part 2B Brochure Supplement – David Salazar	21

## Item 4 - Advisory Business Introduction

## **Our Advisory Business**

Armis Financial is a registered investment adviser. The Adviser was founded in 2018 by David Salazar. The Adviser's principal owner is David Salazar.

#### Services

Armis Financial offers asset management and financial planning and/or consulting services, with an emphasis on building portfolios designed to meet the needs of our clients. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

**Active Asset Management** 

#### Tailored Asset Management Services

As part of the active asset management process we will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and tailor a portfolio with appropriate asset allocations and investment strategy[ies]. Our recommendations and ongoing management are based upon your investment goals, objectives and risk tolerance. We will monitor the account, trade as necessary, and communicate regularly with you.

We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

\* Please note that pursuant to the investment advisory agreement you are obligated to notify us promptly when your financial situation, goals, objectives, or needs change. \*

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. Additionally, trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position.

Armis Financial ADV Part 2A April 18 Page 4 of 22

Periodically, your account may need to be rebalanced or reallocated in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur as required or pursuant to the schedule we have determined together.

You will be responsible for all tax consequences resulting from the sale of any security, rebalancing or reallocation of the account. You are responsible for any taxable events in these instances. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning.

You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

We may also provide you with quarterly performance statements. These statements give you additional feedback regarding performance, educate you about our long-term investment philosophy, and describe any changes in current strategy and allocation along with the reasons for making these changes.

#### **Model Portfolios**

Armis financial offers six distinct model portfolios with twenty-four different variants based on the amount invested and the relevant tax situation. The six models we offer are: Aggressive Wealth Preservation Portfolio, Income Portfolio, Balanced Portfolio, Dividend Income Portfolio, Growth Portfolio and the All-Equity Portfolio.

#### Wealth Preservation:

The Wealth Preservation portfolio aims to provide safe income investments with a much lower risk than other equity portfolios. The objective of this portfolio is to preserve the principal while still providing a steady stream of income that can be either reinvested or to build your cash position. This model allocates 85% of assets into bonds, 10% into cash, 3% into REITS and 2% into equity.

#### Income:

The Income focused portfolio is aimed to provide a steady flow of income while keeping the risk low. The objective of this portfolio is to provide income while not sacrificing asset appreciation. This model allocates 70% of assets into bonds, 20% into equities, 5% into REITS and 5% into cash.

## Balanced:

The Balanced focused portfolio aims to have a proper balance between capital appreciation assets and fixed income assets. This model allocates 45% into bonds, 45% into equities, 5% into REITS and 5% into cash.

#### Dividend Income:

The Dividend Income portfolio aims to hold a majority of the equities in ETFs and stocks that provide a stable or rising divided. This model allocates 65% into equities, 28% into bonds, 5% into REITS and 2% into cash.

Armis Financial ADV Part 2A April 18 Page 5 of 22

#### Growth:

The Growth focused portfolio aims to seek substantial growth with a tolerance for large market fluctuations and increased risk of loss over a long period of time. This model allocates 75% of the assets into equities, 15% into bonds, 8% into REITS and 2% into cash.

#### All-Equity:

The All-Equity portfolio aims to seek substantial growth with a tolerance for large market fluctuations and increased risk of loss over a long period of time. This model allocations 95% of assets into equities, 3% into REITS, and 2% into cash.

#### Financial Planning

We provide services such as comprehensive financial planning, estate planning and educational planning. Fee based financial planning is a comprehensive relationship which incorporates many different aspects of your financial status into an overall plan that meets your goals and objectives. The financial planning relationship consists of face-to-face meetings and ad hoc meetings with you and/or your other advisors (attorneys, accountants, etc.) as necessary.

In performing financial planning services, we typically examine and analyze your overall financial situation, which may include issues such as taxes, insurance needs, overall debt, credit, retirement savings and reviewing your current investment program. Our services may focus on all or only one of these areas depending upon the scope of our engagement with you.

It is essential that you provide the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. We will discuss your investment objectives, needs and goals, but you are obligated to inform us of any changes. We do not verify any information obtained from you, your attorney, accountant or other professionals.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms and conditions of the relationship. You will also receive this Brochure. You are under no obligation to implement recommendations through us. You may implement your financial plan through any financial organization of your choice.

We obtain information from a wide variety of publicly available sources. We do not have any inside private information about any investments that are recommended. All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations. Choosing which advice to follow is your decision.

We can also work with you, in a consulting capacity, to create an Investment Policy Statement (IPS) that will serve as the roadmap to guide your wealth management program. Your IPS will incorporate many different aspects of your financial status into an overall plan designed to meet your goals and objectives. We will create a formal IPS and deliver it to you upon completion.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend using Interactive Brokers LLC ("Interactive Brokers") as the custodian for your accounts.

Armis Financial ADV Part 2A April 18 Page 6 of 22

## Wrap Fee

The Adviser does not sponsor or participate in a third-party sponsored wrap fee program.

## **Assets Under Management**

As of the date of this ADV Part 2 Brochure we do not have any assets under management, as we are a new adviser in 2018.

## **Item 5 - Fees and Compensation**

## **Asset Management Fee Schedule**

The minimum account opening balance is \$10,000, which may be negotiable based upon certain circumstances and at the Adviser's discretion. The fee charged is based upon the amount of money invested. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged monthly, in arrears. Payments are due and will be assessed on the last day of each month, based on the month ending balance of the account(s) under management for the preceding month. The Adviser will pro rate for deposits and withdrawals in the account during the billing period. After the initial month, we will not charge a monthly Net Advisory Fee if your month ending balance in the subsequent month is less than the month ending balance of the previous month.

Fees will be calculated as follows:

Non-Tiered Fee Schedule

AUM	Fee
Up to \$1,000,000	1.00%
\$1,000,001 to \$5,000,000	0.75%
\$5,000,001 to \$10,000,000	0.5%
\$10,000,001 and over billed at	0.25%

Example fee calculation

AUM X %/4 = Total fee

Fee Schedule for Accounts Held at Custodian Other than Interactive Brokers

AUM	Fee

Armis Financial ADV Part 2A April 18 Page 7 of 22

All Assets	0.50%

The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification. Armis Financial believes the advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

The Client acknowledges and agrees that the Adviser may charge for certain additional Assets managed for the Client by the Adviser, but not held by the Custodian (i.e. variable annuities, mutual funds, 401(k), and variable life). In instances in which we charge for additional assets that are not held by the Custodian, we will uphold our fiduciary duty to charge responsible fees for accounts. The fees we charge will be reviewed by our CCO to ensure they are fair and accurate, based on the fee structure for accounts held away, as detailed above. The fee we charge may be negotiable based upon certain circumstances, solely within the Adviser's discretion. In determining whether to charge an asset management fee for these assets, the Adviser will determine when and how much commission the IAR was paid on these assets. If the IAR was paid a commission on the assets within the past two years, he will not charge an asset management fee on these assets. We will disclose this additional fee in the asset management agreement executed by you and the Adviser. We will invoice you for the amount of the additional fee. Payment will be due upon receipt of the invoice.

## **Automatic Payment of Fee**

The Client agrees to authorize the Custodian to pay directly to Armis Financial upon receipt of notice, the Account's investment advisory services fee. Fee withdrawals will occur no more frequently than monthly from the Client's Account, unless specifically instructed otherwise by the Client.

The Custodian will send to the Client a statement, at least monthly, indicating all amounts disbursed from the Account, including the fee paid directly to Armis Financial. Armis Financial's access to the Assets of the Account will be limited to trading and the withdrawals authorized above. Additionally, Armis Financial will send to the Client an invoice reflecting the amount of the fee, the previous month ending balance for the Client's Account on which the fee was based, and the specific manner in which the fee was calculated.

## **Third Party Fees**

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, commissions and other fees and taxes on brokerage accounts and securities transactions. Exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Certain strategies offered by us may involve investment in mutual funds and/or ETFs. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more

Armis Financial ADV Part 2A April 18 Page 8 of 22

or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

## **Financial Planning Fees**

We will not charge a separate fee for financial planning for those clients who also engage us for asset management services. For those clients who engage us solely for financial planning, Armis Financial may provide a comprehensive financial plan for a fixed fee of \$2,500 - \$5,000, which may be negotiable, depending upon the nature and complexity of the client's circumstances. An estimate for total hours will be determined at the start of the advisory relationship. The remainder of the fee is due upon presentation of an investment plan or the rendering of consulting services. Investment plans will be presented to you within 90 days of the contract date, provided that all information needed to prepare the investment plan has been promptly provided to us. We do not accept prepayment of more than \$500 in fees per client, six months or more in advance. The financial planning agreement will terminate once you receive the final plan.

The Financial Planning Agreement will show the fee you will pay.

If the plan is implemented through us, we may receive compensation from advisory services recommended in the financial plan. This compensation would be in addition to the financial planning fee you pay. The fees and expenses you pay for these advisory services may be more or less than the expenses you would pay should you decide to implement our recommendations through another investment advisory firm or broker-dealer and are typically determined by the broker-dealer or investment company sponsoring the product. Therefore, a conflict of interest may exist between our interests and your interests since we may recommend products that pay us compensation. We may have an incentive to recommend particular products based upon the potential compensation rather than your needs. This potential conflict is addressed in our Code of Ethics.

Based upon your needs, we may also provide consultations throughout the year to advise and counsel you about other financial issues. We can help you with transition planning, major transaction analysis, coordinated with cash flow needs, retirement needs, estate planning needs, income tax planning, life and disability insurance needs, investment needs, and college education planning.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

# Item 6 - Performance Based Fee and Side by Side Management

We charge performance-based fees (fees based on a share of capital gains, or capital appreciation of, the assets of a client). If the performance of your investment exceeds the equivalent of an annualized 0% rate (the "Hurdle Rate") at the end of each calendar quarter, we will assess a performance fee of 20% on that part of your investment return, which exceeds the Hurdle Rate. The performance fee we assess will be charged in addition to our asset management fee.

Armis Financial ADV Part 2A April 18 Page 9 of 22

If the value of your investment has decreased at the end of a calendar quarter, we will not charge a performance fee in respect of any subsequent increases until such increases have caused your investment to exceed its previous highest value (its "High Water Mark"). In the event that you make subsequent deposits or withdrawals, we will adjust the High Water Mark to reflect those deposits or withdrawals.

You may become our client any time throughout the calendar quarter, and we will assess and charge our performance fee, if any, at the end of that calendar quarter, with a timeframe starting from when you began the performance-based fee relationship with us. We will adjust all performance fees payable on a pro-rata basis to reflect any deposits or withdrawals made within a calendar quarter.

Although performance fees are typically payable at the end of the calendar quarter, payments can be advanced in the event that you make a withdrawal during the calendar quarter. If you decide to terminate your performance-based fee relationship with us at any time during the calendar quarter and not at the end of the calendar quarter, we will assess and charge our performance fee, if any, at that point in time of the calendar quarter and not at the end of that calendar quarter. Though the High Water Mark may increase or decrease at any time during the remaining calendar quarter subsequent to such a termination of the performance-based fee relationship, we will not subsequently recalculate the performance fee at the end of that quarter and we will not pay any associated refund due to the possibility of the High Water Mark then increasing further and negating any such performance fee calculated prior to the end of the quarter.

We offer performance-based fee accounts to qualified clients only. Non-qualified clients have the option to utilize our asset management services for non-qualified clients. Qualified clients are generally defined as clients having at least \$1,000,000 under management of an investment adviser immediately after entering into the advisory contract, or if the adviser reasonably believes the client has a net worth of more than \$2,100,000 (excluding real estate) at the time the contract is entered into. In measuring clients' assets for the calculation of performance-based fees, we shall include realized and unrealized capital gains and losses.

Performance based fee arrangements may create an incentive for us to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. We have procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

## Item 7 - Types of Client(s)

We provide investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, foundations, endowments, corporations, small businesses and churches.

Our minimum account opening balance is \$10,000 which may be negotiable based upon certain circumstances.

Armis Financial ADV Part 2A April 18 Page 10 of 22

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

## **Methods of Analysis**

We use Fundamental Analysis, Modern Portfolio Theory, Cyclical Analysis and Technical Analysis as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

## **Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

## **Modern Portfolio Theory (MPT)**

We use Modern Portfolio Theory to help select the funds we use in your account.

Modern portfolio theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

#### **Technical Analysis**

Technical Analysis is a technique that attempts to determine a security's value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market's price reflects all relevant information so the analysis focuses on the history of a security's trading behavior rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act upon relevant information rather than focusing on the information itself. Ultimately, technical analysts develop trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future return.

Armis Financial ADV Part 2A April 18 Page 11 of 22

#### **Cyclical Analysis**

While we do not attempt to time the market, we may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in your investment strategies depending upon long and short-term trends in financial markets and the performance of the overall national and global economy.

## **Investment Strategies**

In order to perform this analysis, we use many resources, such as:

- In-house research
- Third-party research
- Inspections of corporate activities
- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings
- Company press releases and websites

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases securities sold within a year

## **Risk of Loss**

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

#### Alternative Investment Risk

Investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:

- Loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices
- Lack of liquidity in that there may be no secondary market for the fund and none expected to develop
- Volatility of returns

Armis Financial ADV Part 2A April 18 Page 12 of 22

- Absence of information regarding valuations and pricing
- Delays in tax reporting
- Less regulation and higher fees than mutual funds.

#### **Bond Fund Risk**

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk the possibility that companies or other issuers whose bonds are owned by the
  fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit
  risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By
  contrast, those that invest in the bonds of companies with poor credit ratings generally will
  be subject to higher risk.
- Interest Rate Risk the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

### Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.

#### Modern Portfolio Theory (MPT) Risk

Modern Portfolio Theory tries to understand the market as a whole and measure market risk in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

#### Cyclical Analysis Risk

Looking at market cycles in conjunction with other investment strategies can be useful when making investment decisions. However, market cycles are not always predictable. Each financial investment strategy has benefits and risks. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

### Exchange Traded Fund ("ETF") Risk

Most ETFs are passively managed investment companies whose shares are purchased and sold on a securities exchange. An ETF represents a portfolio of securities designed to track a particular market segment or index. ETFs are subject to the following risks that do not apply to conventional funds:

- The market price of the ETF's shares may trade at a premium or a discount to their net asset value;
- An active trading market for an ETF's shares may not develop or be maintained; and
- There is no assurance that the requirements of the exchange necessary to maintain the listing of an ETF will continue to be met or remain unchanged

#### Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

## Technical Analysis risk

- Technical analysis is derived from the study of market participant behavior and its efficacy is a matter of controversy.
- Methods vary greatly and can be highly subjective; different technical analysts can sometimes
  make contradictory predictions from the same data.
- Models and rules can incur sufficiently high transaction costs.

#### **Overall Risks**

Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.

Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

Armis Financial ADV Part 2A April 18 Page 14 of 22

# **Item 9 - Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning Armis Financial or any of our IARs. We adhere to high ethical standards for all IARs and associates.

## Item 10 - Other Financial Industry Activities and Affiliations

Neither Armis Financial nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither Armis Financial nor its management persons are affiliated with any broker-dealer.

Armis Financial and its management persons are not registering as a commodity pool operator, futures commission merchant, or commodity trading advisor.

## Other Financial Industry Affiliations

The IARs of Armis Financial have the following outside business activities and/or affiliations to disclose.

As noted in Item 10 "Other Financial Industry Activities and Affiliations" above, David Salazar has the following outside business activities and/or affiliations to disclose.

David Salazar is employed as a Tennis Coach for St. Stephens Episcopal School. David Salazar spends less than 10% of his time engaging in this activity.

David Salazar is compensated for his role as a Tennis Coach for St. Stephens Episcopal School. David Salazar receives no other compensation.

# Item 11 - Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

#### **General Information**

We have adopted a Code of Ethics for all IARs of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our IARs must acknowledge the terms of the Code of Ethics annually, or as amended.

Armis Financial ADV Part 2A April 18 Page 15 of 22

## **Participation or Interest in Client Accounts**

Our Compliance policies and procedures prohibit anyone associated with Armis Financial from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

## **Personal Trading**

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Armis Financial has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

• No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of Armis Financial, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

Armis Financial ADV Part 2A April 18 Page 16 of 22

## **Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

## **Conflicts of Interest**

Armis Financial's IARs may employ the same strategy for their personal investment accounts as it does for its clients. However, IARs may not place their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

## **Item 12 - Brokerage Practices**

#### **Factors Used to Select Custodians**

In recommending a custodian/broker-dealer, we look for a company that offers relatively low transaction fees, access to desired securities, trading platforms, and support services. We may recommend clients use Interactive Brokers as the qualified custodian for their accounts when utilizing our asset management services.

#### **Soft Dollars**

We do not receive any soft dollars from broker-dealers, custodians or third party money managers.

#### **Best Execution**

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

## **Brokerage for Client Referrals**

In selecting and/or recommending broker-dealers, we do not take into consideration whether or not we will receive client referrals from the broker-dealer or third party.

Armis Financial ADV Part 2A April 18 Page 17 of 22

## **Directed Brokerage**

We do not permit directed brokerage. We will require you to use the custodian of our choosing as the custodial firm.

## **Trading**

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## Item 13 - Review of Accounts

#### **Reviews**

Reviews are conducted at least annually or as agreed to by us. Reviews will be conducted by our Chief Compliance Officer, David Salazar. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

## **Reports**

You will be provided with account summary statements reflecting the transactions occurring in the account and account performance on at least a quarterly basis. These statements will be written or electronic depending upon what you selected when you opened the account. You will be provided with paper confirmations for each securities transaction executed in the account by the custodian. You are obligated to notify us of any discrepancies between the statements provided by Armis Financial and the custodian(s) or any concerns you have about the account(s).

# **Item 14 - Client Referrals and Other Compensation**

We do not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients nor do we directly or indirectly pay any compensation to another person if they refer clients to us.

## **Item 15 - Custody**

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your advisory fees from the custodian. We use

Armis Financial ADV Part 2A April 18 Page 18 of 22

Interactive Brokers as the custodian and/or broker-dealer for all your accounts. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Armis Financial.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. You authorized the custodian to pay us directly at the onset of the relationship.

## **Item 16 - Investment Discretion**

We manage assets on a non-discretionary basis. The fact that you have granted us with non-discretionary authority will be evidenced via the written, non-discretionary agreement between the client and the Adviser. Consequently, we cannot buy or sell any security in your account without your prior, express permission. Please be advised that this could adversely affect the Adviser's ability to take advantage of price swings when attempting to purchase or sell securities in the client's account, especially in instances where the Adviser is not able to contact the client in a timely manner.

When active asset management services are provided on a non-discretionary basis the client will enter into a separate custodial agreement with the custodian. The custodian agreement will include a limited power of attorney to trade in the client's account(s) which authorizes the custodian to take instructions from us regarding trades approved by the client.

## **Item 17 - Voting Client Securities**

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

## Item 18 - Financial Information

We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings.

Armis Financial ADV Part 2A April 18 Page 19 of 22

In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

## Item 19 - Requirements for State Registered Advisers

## **Principals**

There is one principal of Armis Financial, David Salazar. He is the CCO and was born in 1991. His education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

## **Performance Fees**

As described in Item 6 - "Performance Based Fee and Side by Side Management", Armis Financial and David Salazar do receive performance fees.

#### **Disclosable Events**

Neither Armis Financial nor David Salazar has any reportable events to disclose here.

## **Other Relationships**

Neither Armis Financial nor David Salazar has any relationship with any issuer of securities.

## **ADV Part 2B Brochure Supplement - David Salazar**

**Item 1 - Cover Page** 

# **David Salazar**

CRD #: 6726030

Armis Financial, LLC 106 E. Sixth Street, Suite 900 Austin, TX 78701 www.armisfinancial.com (512) 709-9741 April 25, 2018

This Brochure supplement provides information about David Salazar and supplements the Armis Financial ("Armis Financial") Brochure. You should have received a copy of that Brochure. Please contact David Salazar if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about David Salazar, CRD#: 6726030 is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

Armis Financial ADV Part 2B April 18 Page 21 of 22

## Item 2 - Educational Background and Business Experience

Full Legal Name: David Salazar Year of Birth: 1991

**Education** 

Bachelor of Arts in Accounting 2014

Lipscomb University, Nashville, TN

Masters of Science in Finance Management 2016

Durham University School of Business, Durham, United Kingdom

**Business History** 

March 2018 – Present CCO and Managing Member at Armis Financial, LLC

November 2016 – February 2018 Financial Advisor at Edward Jones

October 2015 - January 2017 Student at Durham University School of Business

May 2014 – October 2015 Tennis Coach at United States Military Academy at West Point

August 2010 – May 2014 Student at Lipscomb University

## **Item 3 - Disciplinary History**

Neither Armis Financial nor David Salazar has any disciplinary history to disclose.

## **Item 4 - Other Business Activities**

As noted in Item 10 "Other Financial Industry Activities and Affiliations" above, David Salazar has the following outside business activities and/or affiliations to disclose.

David Salazar is employed as a Tennis Coach for St. Stephens Episcopal School. David Salazar spends less than 10% of his time engaging in this activity.

## **Item 5 - Additional Compensation**

David Salazar receives the following other compensation.

David Salazar is compensated for his role as a Tennis Coach for St. Stephens Episcopal School. David Salazar receives no other compensation.

## **Item 6 - Supervision**

David Salazar is the CCO and performs all supervisory duties for his firm.

## Item 7 - Requirements for State-Registered Advisers

David Salazar has no reportable events to disclose here.

Armis Financial ADV Part 2B April 18 Page 22 of 22