



**III FINANCIAL**  
PRIORITIZE. PLAN. PERSEVERE.

## **III Financial, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 1, 2016**

This Disclosure Brochure provides information about the qualifications and business practices of III Financial, LLC (“III Financial”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (512) 562-1905 or by email at [info@iiifinancial.com](mailto:info@iiifinancial.com).

The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about III Financial to assist you in determining whether to retain the Advisor.

Additional information about III Financial and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

III Financial, LLC  
CRD No: 159844  
13492 Research Blvd. Suite 120/248  
Austin, TX 78750  
Phone: (512) 562-1905 \* Fax: (512) 900-7665  
<http://www.iiifinancial.com>

## **Item 2 – Material Changes**

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the “Advisers Act”). The amendments are designed to require a Registered Investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor’s business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts: *Part 2A and Part 2B*.

*Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of III Financial.

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

### **Material Changes**

There have been no material changes to this Disclosure Brochure since the last distribution to Clients.

### **Future Changes**

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

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for III Financial:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **159844** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (512) 562-1905 or by email at [info@iiifinancial.com](mailto:info@iiifinancial.com).

## **Item 3 – Table of Contents**

<b>Item 1 – Cover Page</b> .....	<b>1</b>
<b>Item 2 – Material Changes</b> .....	<b>2</b>
<b>Item 3 – Table of Contents</b> .....	<b>3</b>
<b>Item 4 – Advisory Services</b> .....	<b>4</b>
A. Firm Information .....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	5
D. Wrap Fee Programs .....	6
E. Assets Under Management.....	6
<b>Item 5 – Fees and Compensation</b> .....	<b>6</b>
A. Fees for Advisory Services .....	6
B. Fee Billing.....	7
C. Other Fees and Expenses .....	7
D. Advance Payment of Fees and Termination.....	7
E. Compensation for Sales of Securities.....	7
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b> .....	<b>8</b>
<b>Item 7 – Types of Clients</b> .....	<b>8</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>8</b>
A. Methods of Analysis .....	8
B. Risk of Loss .....	8
<b>Item 9 – Disciplinary Information</b> .....	<b>9</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b> .....	<b>9</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	<b>10</b>
A. Code of Ethics .....	10
B. Personal Trading with Material Interest .....	10
C. Personal Trading in Same Securities as Clients .....	10
D. Personal Trading at Same Time as Client.....	10
<b>Item 12 – Brokerage Practices</b> .....	<b>10</b>
A. Recommendation of Custodian[s].....	10
B. Aggregating and Allocating Trades .....	11
<b>Item 13 – Review of Accounts</b> .....	<b>11</b>
A. Frequency of Reviews .....	11
B. Causes for Reviews .....	11
C. Review Reports .....	11
<b>Item 14 – Client Referrals and Other Compensation</b> .....	<b>12</b>
A. Compensation Received by III Financial.....	12
B. Client Referrals from Solicitors .....	12
<b>Item 15 – Custody</b> .....	<b>12</b>
<b>Item 16 – Investment Discretion</b> .....	<b>12</b>
<b>Item 17 – Voting Client Securities</b> .....	<b>12</b>
<b>Item 18 – Financial Information</b> .....	<b>13</b>
<b>Item 19 – Requirements for State Registered Advisors</b> .....	<b>13</b>
A. Educational Background and Business Experience of Principal Officer .....	13
B. Other Business Activities of Principal Officer .....	13
C. Performance Fee Calculations .....	13
D. Disciplinary Information .....	13
E. Material Relationships with Issuers of Securities .....	13
<b>ADV Part 2B</b> .....	<b>14</b>
<b>Privacy Policy</b> .....	<b>17</b>

## **Item 4 – Advisory Services**

### **A. Firm Information**

III Financial, LLC (“III Financial” or the “Advisor”) is a Registered Investment Advisor, which is organized as a Limited Liability Company (LLC) under the laws of the State of Texas. III Financial was founded in November 2011, and is owned and operated by Founder, Elliott Henry Weir, III. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by III Financial.

### **B. Advisory Services Offered**

III Financial offers comprehensive financial planning and investment advisory services to individuals, high net worth individuals, trusts, and estates in Texas and other states (each referred to as a “Client”).

#### **Comprehensive Wealth Management**

III Financial provides a customized approach to each client combining investment advisory solutions with financial planning services for its Clients. This is achieved through initial and ongoing meetings with the Client and continuous personal Client contact and interaction while providing discretionary investment management and consulting services. III Financial works with each Client to identify their investment goals and objectives as well as their desire for risk and financial situation in order to create a portfolio allocation. Generally, such planning will involve preparing a financial plan or rendering a financial consultation for clients based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, insurance, personal risk management and other areas of a Client’s financial situation.

A plan will usually include general recommendations for a course of activity or specific actions to be taken by the Client or Advisor. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, alter insurance programs, or establish education savings and/or charitable giving programs. III Financial may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations.

III Financial will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks and bonds to meet the needs of its Clients. III Financial’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. III Financial will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and desired level of risk agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

III Financial evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. III Financial may recommend, on occasion, redistributing investment allocations to diversify the portfolio. III Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. III Financial may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in desired risk level of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s desired risk level.

Prior to rendering investment advisory services, III Financial will ascertain, in conjunction with the Client, the Client’s financial situation, desired risk level, and investment objective[s]. III Financial will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will III Financial accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

### Selection of Other Advisors

III Financial may recommend and refer Clients to unaffiliated money managers or investment advisors (“Third-Party Manager”) to meet the investment goals and objectives of its Clients. Through these arrangements, the Client will then enter into an advisory agreement with the Third-Party Manager authorizing them to assist and advise the Client in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such, the Third-Party Manager will receive an investment advisory fee, billed quarterly, either in advance or arrears; based on the account asset value. III Financial will receive a portion of the investment advisory fee for the solicitation and referral of the Client to the Third-Party Manager.

III Financial will supervise the activities and performance of the Third-Party Manager, to ensure adherence to the Client’s objectives. III Financial will assist the Client in completing their Client questionnaire, account opening paperwork and any information required to establish their account[s]. III Financial will assist the Client with the asset allocation and portfolio construction decisions to enable the Third-Party Manager to effectively assume day-to-day investment management of the Client’s account[s].

Each Client engagement will entail a review of the Client’s investment goals, financial situation, time horizon, desire for risk and other factors to ensure the Advisors investment philosophy is appropriate to meet the Client’s objectives. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client’s Account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of such information. It is the responsibility of the Client to inform III Financial of any changes in financial condition, goals or other factors that may affect this analysis.

With respect to marketing materials prepared by Third-Party Managers, III Financial reviews certain marketing materials for distribution to clients to determine whether the materials appear to be facially consistent with applicable laws and regulatory standards. Clients should note, however, that III Financial only reviews materials distributed through III Financial, and generally does not review any marketing or other materials sent directly to the client by the Third-Party Managers. Further, III Financial does not review the data or calculations underlying performance information found in marketing or other materials prepared by these parties. Finally, Third-Party Managers may not calculate their respective performance information on a uniform or consistent basis, and may follow differing industry standards.

The Client, prior to entering into an agreement with a Third-Party Manager recommended by III Financial, will be provided with that manager’s Form ADV Part 2. In addition, III Financial and its Client will agree, in writing, that the Client’s account will be managed by the Third-Party Manager on a discretionary basis.

The Client, prior to entering into an agreement with unaffiliated money manager[s] or investment advisor[s], will be provided with the advisor’s Form ADV 2 (or a brochure that makes the appropriate disclosures).

### **C. Client Account Management**

Prior to engaging III Financial to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Comprehensive Financial Planning – III Financial, through the use of financial planning software, prepares individual financial plans for clients. The plans are based upon a client’s individual circumstances and may include components addressing client goals such as education, retirement, estate planning, life insurance protection, and disability protection. Clients may obtain a comprehensive financial plan or a focused plan concentrating on certain specific goals. The plan may include general recommendations about investment strategies but does not recommend the purchase or sale of specific securities. Maintenance of this plan is part of the on-going advisory relationship with III Financial.
- Establishing an Investment Policy Statement – III Financial, in connection with the Client, may develop a statement that summarizes the Client’s investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information

on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client's desire for risk, and any restrictions imposed by the Client.

- Asset Allocation – III Financial will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and desired risk level for each Client.
- Portfolio Construction – III Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – III Financial will provide investment management and ongoing oversight of the Client's portfolio and overall account.
- Investment Supervision – III Financial will supervise the day-to-day investment management activities performed by the Third-Party Manager.

#### **D. Wrap Fee Programs**

III Financial does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by III Financial.

#### **E. Assets Under Management**

As of January 31, 2016, the most recent date for which such calculations are provided pursuant to securities regulations, III Financial manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$8,100,000
Non-Discretionary Assets	\$0
Total	\$8,100,000

### **Item 5 – Fees and Compensation**

The following paragraphs detail the fee structure and compensation methodology for comprehensive financial planning and investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of III Financial and the Client.

#### **A. Fees for Advisory Services**

##### Comprehensive Wealth Management

Comprehensive Wealth Management Fees are paid quarterly in arrears on a fixed fee basis. The Advisor charges Clients a fixed fee based on the complexity of their situation and on three tiers of net worth: Less than \$250,000; \$250,000-\$1M; and greater than \$1M. III Financial believes a flat fee is the best way to provide clients with a truly transparent and simple fee that is based on the value delivered and the level of advice sophistication required. This fee includes comprehensive financial planning and investment advisory services.

All securities held in accounts managed by III Financial will be independently valued by the designated Custodian. III Financial will not have the authority or responsibility to value portfolio securities. Discounts not generally available to clients may be offered to family members and friends of associated persons of the Firm.

While the Clients fees are fixed throughout the year, the Advisor will perform an evaluation prior to each fee billing to make sure the fees do not exceed the 2.50% maximum. If the values of the assets drop below a level where the effective fee is above 2.50% the fee will be adjusted for that current billing period.

Certain Clients may have different fee arrangements than noted above due to legacy fee schedules and arrangements. In addition, the Advisor may waive or reduce fees at its sole discretion.

### Selection of Other Advisors

For Clients referred to an unaffiliated investment advisor, the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to III Financial. Please see Item 14 for additional details.

## **B. Fee Billing**

### Comprehensive Wealth Management

Comprehensive Wealth Management Fees will be billed to the Clients directly. The amount due is a fixed amount. Clients will be provided with a statement, at least quarterly but usually monthly, from the Custodian reflecting the balance in the Client's account. In addition, upon request the Advisor will provide the Client an invoice itemizing the fee, including the period covered by the fee and the account value. Generally, Clients pay via a fee deduction from a designated investment account.

### Selection of Other Advisors

Investment Advisory Fees will be automatically deducted from the Client's account[s] by the Third-Party Manager from the Client's account[s] at the designated Custodian. The Third-Party Manager will compensate III Financial from these fees. Clients will be provided with a quarterly statement from the Custodian reflecting deduction of the Investment Advisory Fees and may receive additional reporting from the Third-Party Manager. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third-parties, other than III Financial, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by III Financial is separate and distinct from these custodian and execution fees.

In addition, all fees paid to III Financial for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of III Financial, but would not receive the services provided by III Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by III Financial to fully understand the total fees to be paid.

## **D. Advance Payment of Fees and Termination**

### Comprehensive Wealth Management

III Financial is compensated for its services in arrears. Clients may request to terminate their Comprehensive Wealth Management Agreement with III Financial, in whole or in part, by providing advance written notice. The Client shall be responsible for Comprehensive Wealth Management Fees up to and including the effective date of termination. The Client's Comprehensive Wealth Management Agreement with the Advisor is non-transferable without Client's written approval.

### Unaffiliated Money Management

In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. III Financial will assist the Client with the termination and transition as appropriate.

## **E. Compensation for Sales of Securities**

III Financial does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

III Financial does not charge performance-based fees for its investment advisory services. The fees charged by III Financial are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

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

## **Item 7 – Types of Clients**

III Financial provides investment advisory services to the following types of Clients:

- Individuals (other than high net worth individuals)- private investors, investing their personal assets
- High net worth individuals- private investors, investing their personal assets

The relative percentage of each type of Client is available on III Financial's Form ADV Part 1. These percentages will change over time. III Financial generally does not impose a minimum account size for establishing a relationship. Generally there is fee ranging from \$3,000-\$12,000 per year. This may be waived or lowered at the sole discretion of the Advisor.

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

### **A. Methods of Analysis**

III Financial primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from III Financial is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, III Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. III Financial will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, III Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. III Financial will assist Clients in determining an appropriate strategy based on their desire for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13.



Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, desire for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their desired risk level as part of the portfolio construction process.

When reviewing third party investment advisers and money managers, III Financial examines factors such as the experience, expertise, investment philosophies, expenses, firm infrastructure and past performance of investment advisers and money managers, initially and on an on-going basis, in an attempt to determine if that investment advisers or money manager has reasonably demonstrated an ability or the potential to meet their investment objectives over a period of time and in different economic conditions. A risk of investing with a third party manager who has been successful in the past is that he/she may not be able to replicate that success over a period of time and in different economic conditions. A risk of investing with a third party manager who has been successful in the past is that he/she may not be able to replicate that success in the future.

The Firm does not provide legal or tax advice. Clients with tax or legal questions should seek a qualified independent expert.

Following are some of the risks associated with certain transactions:

#### Real Estate

The performance of real estate investments can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments are concentrated and may carry higher risks. Client should only have a portion of their assets in these investments. Risks may include negative cash flows from property, incorrectly appraised assets, market declined and volatility, as well as many other risks.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (512) 562-1905 or via email at [info@iiifinancial.com](mailto:info@iiifinancial.com).

### **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving III Financial or any of its employees.** III Financial and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **159844** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Elliott H. Weir by selecting the Investment Adviser Representative and entering Mr. Weir's Individual CRD# **4712824** in the field labeled "Individual CRD Number".

### **Item 10 – Other Financial Industry Activities and Affiliations**

None.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

III Financial has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with III Financial. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. III Financial and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of III Financial associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. III Financial has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (512) 562-1905 or via email at [info@iiifinancial.com](mailto:info@iiifinancial.com).

### **B. Personal Trading with Material Interest**

III Financial allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. III Financial does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. III Financial does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

III Financial allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### **D. Personal Trading at Same Time as Client**

While III Financial allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades do not occur at the same time. III Financial will place trades only after Client orders have been placed and filled.

At no time, will III Financial or any associated person of III Financial, transact in any security to the detriment of any Client.

## **Item 12 – Brokerage Practices**

### **A. Recommendation of Custodian[s]**

III Financial does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize III Financial to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, III Financial does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where III Financial does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will

not incur any extra fee or cost associated with using a broker not recommended by III Financial. III Financial may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. III Financial does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

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

1. **Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **III Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
2. **Brokerage Referrals** - III Financial does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
3. **Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where III Financial will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, III Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. III Financial will execute its transactions through an unaffiliated broker-dealer selected by the Client. III Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Mr. Weir, Founder of III Financial. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13A, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify III Financial if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

### **A. Compensation Received by III Financial**

#### Unaffiliated Money Management

III Financial will be compensated by the Third-Party Manager[s] from the advisory fees collected from the Client. Details of these fees are described in Item 5 – Fees and Compensation. III Financial does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party, except the Third-Party Manager[s].

### **B. Client Referrals from Solicitors**

III Financial does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

III Financial does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct III Financial to utilize that custodian for the Client's security transactions. III Financial encourages Clients to review statements provided by account custodian and to compare those statements to the ones provided by III Financial for consistency and accuracy. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

III Financial generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by III Financial. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by III Financial will be in accordance with each Client's investment objectives and goals.

#### Unaffiliated Money Management

In the event the Client engages the Third-Party Manager, III Financial does not have the discretionary authority to place or direct trades on behalf of the Client. Clients will generally enter into a discretionary advisory agreement with the Third-Party Manager[s] that will perform day-to-day investment management and supervision of the Client's account[s].

## **Item 17 – Voting Client Securities**

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

## **Item 18 – Financial Information**

Neither III Financial, nor its management has any adverse financial situations that would reasonably impair the ability of III Financial to meet all obligations to its Clients. Neither III Financial, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. III Financial is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

## **Item 19 – Requirements for State Registered Advisors**

### **A. Educational Background and Business Experience of Principal Officer**

The Founder of III Financial is Elliott H. Weir. Information regarding the formal education and background of Mr. Weir is included in Item 2 of Part 2B below.

### **B. Other Business Activities of Principal Officer**

None.

### **C. Performance Fee Calculations**

III Financial does not charge performance-based fees for its investment advisory services. The fees charged by III Financial are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

### **D. Disciplinary Information**

*There are no legal, civil or disciplinary events to disclose regarding III Financial or Mr. Weir.* Neither III Financial nor Mr. Weir has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against III Financial or Mr. Weir.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding III Financial or Mr. Weir.*

### **E. Material Relationships with Issuers of Securities**

Neither III Financial nor Mr. Weir has any relationships or arrangements with issuers of securities.



## Form ADV Part 2B – Brochure Supplement

for

Elliott Henry Weir, III  
Founder

Effective: March 1, 2016

This Brochure Supplement provides information about the background and qualifications of Elliott Henry Weir, III (CRD# **4712824**) in addition to the information contained in the III Financial, LLC (“III Financial” or the “Advisor” - CRD #159844) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the III Financial Disclosure Brochure or this Brochure Supplement, please contact us at (512) 562-1905 or by email at [info@iiifinancial.com](mailto:info@iiifinancial.com).

Additional information about Mr. Weir is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

The Founder of III Financial is Elliott Henry Weir, III. Mr. Weir, born in 1974, is a dedicated Portfolio Manager for Client accounts of III Financial.

Mr. Weir earned a Master's of Business Administration with a concentration in Finance from The University of Texas McCombs School of Business in 2002. Mr. Weir earned a Bachelor of Science in Computer Science from Southern Methodist University in 1996.

Additional information regarding Mr. Weir's employment history is included below.

### Employment History:

Founder, III Financial, LLC	01/2012 to Present
Financial Planner, Mass Mutual d/b/a Asset Strategies Group, LLC	01/2005 to 01/2012
Financial Professional, New England Financial	03/2004 to 12/2004
Pricing Analyst, IBM Tivoli	06/2002 to 03/2004

### Designations:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Unlike many financial advisors, CFP® professionals must develop their theoretical and practical knowledge by completing a comprehensive course of study at a college or university offering a financial planning curriculum approved by CFP Board. Applicants may also satisfy the education requirement by submitting a transcript review or previous financial planning-related course work. Or, they can show that they have attained certain professional designations or academic degrees that cover the important subjects in CFP Board's financial planning curriculum.
- **Examination** – CFP® professionals must pass the comprehensive CFP® Certification Exam, which tests their abilities to apply financial planning knowledge to real-life situations. The exam covers the financial planning process, tax planning, employee benefits and retirement planning, estate planning, investment management and insurance. This comprehensive exam ensures that a CFP® professional is highly qualified to develop a plan for your finances.
- **Experience** – CFP® professionals complete several years of experience related to delivering financial planning services to clients prior to earning the right to use the CFP® certification trademarks. This hands-on experience guarantees that CFP® professionals have practical financial planning knowledge, so you can count on them to help you create a realistic financial plan that fits your individual needs.
- **Ethics** – When it comes to ethics and professional responsibility, CFP® professionals are held to the highest of standards, as outlined in CFP Board's *Standards of Professional Conduct*. They are obliged to uphold the principles of integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence as outlined in CFP Board's *Code of Ethics*. The *Rules of Conduct* require CFP® professionals to put your interests ahead of their own at all times and to provide their financial planning services as a "fiduciary"—acting in the best interest of their financial planning clients. CFP® professionals are subject to CFP Board sanctions if they violate these standards.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – CFP® professionals are held to the highest of standards. CFP Board's Code of Ethics outlines CFP® professionals' obligations to uphold principles of integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence. The Rules of Conduct require CFP professionals to put clients' interests above their own, and to provide their financial planning services as a "fiduciary" – acting in the best interest of their financial planning clients. CFP® professionals are subject to sanctions if they violate these standards.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 – Disciplinary Information**

*There are no legal, civil or disciplinary events to disclose regarding Mr. Weir.* Mr. Weir has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Weir.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Weir.***

However, we do encourage you to independently view the background of Mr. Weir on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4712824** in the field labeled "Individual CRD Number".

### **Item 4 – Other Business Activities**

Mr. Weir does not have any other business activities.

### **Item 5 – Additional Compensation**

Mr. Weir does not have any other business activities where compensation is received.

### **Item 6 – Supervision**

Mr. Weir serves as the Founder and Chief Compliance Officer of III Financial. Mr. Weir can be reached at (512) 562-1905.

III Financial has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of III Financial. Further, III Financial is subject to regulatory oversight by various agencies. These agencies require registration by III Financial and its employees. As a registered entity, III Financial is subject to examinations by regulators, which may be announced or unannounced. III Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Item 7 – Requirements for State Registered Advisors**

Mr. Weir does not have any additional information to disclose.

### **Privacy Policy**

Effective: February 28, 2015

#### **Our Commitment to You**

III Financial, LLC (“III Financial”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. III Financial (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does III Financial provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

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

#### **The Information We Collect About You**

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

#### **Information About You That III Financial Shares**

III Financial works to provide services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy III Financial's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

**To repeat, we do not sell your non-public personal information to anyone.**

### Information About Former Clients

III Financial does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

### Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

### We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (512) 562-1905 or via email at [info@iiifinancial.com](mailto:info@iiifinancial.com).