

Form ADV Part 2A Brochure

February 26, 2020

This brochure provides information about the qualifications and business practices of 57 West Capital Advisors, Inc. and its investment adviser representatives. If you have any questions about the contents of this brochure, please contact Juan Gabriel Garcés at (512) 346 - 9705 or email us at jg@57west.us

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration of an investment adviser does not imply any level of skill or training.

Additional information about 57 West Capital Advisors, Inc., Juan Gabriel Garcés, Juan Sebastián Garcés and Taylor Michael Tucker is available on the SEC's website at: www.adviserinfo.sec.gov

57 West Capital Advisors, Inc. has three investment adviser representatives: Juan Gabriel Garcés (supervising principal), Juan Sebastian Garcés, and Taylor Michael Tucker.

> 11615 Angus Rd. Suite 104-K Austin, TX 78759, United States of America +1 (512) 346 - 9705 | www.57West.us

ITEM 2 – MATERIAL CHANGES

This section will contain any amendments or material changes to our ADV Part 2 from our last annual update.

Item 4 – Advisory Business

"As of December 31st, 2018 57 West Capital Advisors, Inc. had a total of 9 million dollars in discretionary managed accounts." Has changed to:

"As of December 31st, 2019 57 West Capital Advisors, Inc. had a total of \$13,537,285 in discretionary managed accounts and \$0 in non-discretionary accounts."

Item 10 – Other Financial Industry Activities and Affiliations

We have added the following additional disclosure:

"57 West Capital Partners, Inc. has an ownership interest in Bedrock Capital Partners LLC, the Managing Member of Texas ColdWorks, LLC, a Texas based limited liability company formed for the purpose of acquiring, owning, improving, developing and operating a cold storage facility in Austin, TX. Investments in Texas ColdWorks, LLC are offered and sold only to "accredited investors" as that term is defined in Rule 501(a) of Regulation D promulgated under the Securities Act. Bedrock Capital Partners LLC is compensated for acting as the Managing Member of this entity.

57 West Capital Advisors, Inc.'s advisory clients are currently invested in or may be solicited to invest in

Texas ColdWorks, LLC along with Associated Persons of 57 West Capital Advisors, Inc. No advisory fees are assessed for assets invested in Texas ColdWorks, LLC. Investors to whom this private offering is made will receive a Subscription and Limited Liability Company Agreements, and other relevant offering documents. Please refer to the offering documents for a complete description of the fees, conflicts of interest, investment objectives, risks, and other important information associated with investing in this company."

Item 15 – Custody

"57 West Capital Advisors, Inc. does not have custody of its client's funds and securities."

Has changed to:

"57 West Capital Advisors, Inc. is deemed to have custody of client funds and securities because of the fee deduction authority granted by the client in the investment advisory agreement. We maintain safeguards in accordance with regulatory requirements regarding custody of client assets.

We are also deemed to have custody of client funds and securities due to our affiliation with Texas ColdWorks, LLC (described in further detail under Item 10 above). The Managing Member of Texas ColdWorks, LLC has retained an independent certified public accountant to conduct an annual audit of the pooled investment vehicle and the audited financial statements are distributed to the investors in Texas ColdWorks, LLC."

Item 3 - TABLE OF CONTENTS

ITEM 1 - Cover Page1
ITEM 2 - Material Changes
ITEM 3 - Table of Contents
ITEM 4 - Advisory Business
ITEM 5 - Fees & Compensation
ITEM 6 - Performance-Based Fees and Side by Side Management5
ITEM 7 - Types of Clients5
ITEM 8 - Methods of Analysis, Investment Strategies and Risk of Loss
ITEM 9 - Disciplinary Information
ITEM 10 - Other Financial Industry Activities and Affiliations6
ITEM 11 - Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading6
ITEM 12 - Brokerage Practices6
ITEM 13 - Review of Accounts7
ITEM 14 - Client Referrals & Other Compensation7
ITEM 15 - Custody7
ITEM 16 - Investment Discretion8
ITEM 17 - Voting Client Securities
ITEM 18 - Financial Information8
ITEM 19 - Requirements for State-Registered Advisers
ITEM 20 - Form ADV Part 2B – Brochure Supplements

ITEM 4 – ADVISORY BUSINESS

57 West Capital Advisors, Inc. is a state registered investment advisory company specializing in managing equity portfolios. The company is 100% owned by 57West Capital Partners, Inc., an offshore investment and holding company. Juan Gabriel Garcés is the principal owner of the holding company. All other shareholders individually hold less than 25% of its stock. 57 West Capital Partners, Inc. owns and manages Freedom Capital Fund Ltd. an offshore mutual fund open only to non-citizens and nonresidents of the United States.

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

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

57 West Capital Advisors, Inc. does not tailor investment portfolios to particular client needs; it manages full or partial portions of client portfolios which clients prefer invested in equities. Clients can impose restrictions as to the selection of equities and margin loan levels on their accounts.

As of December 31, 2019 57 West Capital Advisors, Inc. had a total of \$13,537,285 in discretionary managed accounts and \$0 in nondiscretionary accounts.

ITEM 5 – FEES AND COMPENSATION

57 West Capital Advisors, Inc. charges fees based on daily or monthly closing values of assets in each account. All fees are subject to negotiation and the specific percentage charged is stipulated in the written agreement between each client and the advisory company. Depending on the value of the account, complexity, specific needs, and geographic location of each client, fees can range from .15% to 2.95% of the asset value per year.

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

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

For payment method clients can select to either deduct the fees directly from their account or make payment by check or wire transfer. Management fees may or may not be prorated to take into account capital withdrawals or contributions within a given month.

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

57 West Capital Advisors, Inc. does not have prepayment arrangements of fees with clients on the accounts it manages.

ITEM 6 – PERFORMANCE BASED COMPENSATION

57 West Capital Advisors, Inc. does not charge performance-based compensation.

ITEM 7 – TYPES OF CLIENTS

57 West Capital Advisors, Inc. provides portfolio management services to individuals and investment companies such as mutual funds and corporations.

The minimum amount required for opening an account is \$5,000 dollars. This requirement is waived when a client commits to depositing a predetermined amount into their account on an annual basis.

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

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

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

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

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

ITEM 9 – DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report at this time for 57 West Capital Advisors, Inc. and Juan Gabriel Garces.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

57 West Capital Advisors, Inc. is 100% owned by 57 West Capital Partners, Inc., an offshore investment and holding company also registered with the Secretary of State in Texas. This company provides business consultancy services to third parties as well as to clients of 57 West Capital Advisors, Inc.

Juan Gabriel Garces as president and officer of 57 West Capital Partners, Inc. dedicates time to managing the affairs and business of that entity. These activities represent no more than about onethird of the advisor's available work time.

The advisor believes the above relationships may be complimentary to its obligations and do not constitute a material conflict of interest with clients.

57 West Capital Partners, Inc. has an ownership interest in Bedrock Capital Partners LLC, the Managing Member of Texas ColdWorks, LLC, a Texas based limited liability company formed for the purpose of acquiring, owning, improving, developing and operating a cold storage facility in Austin, TX. Investments in Texas ColdWorks, LLC are offered and sold only to "accredited investors" as that term is defined in Rule 501(a) of Regulation D promulgated under the Securities Act. Bedrock Capital Partners LLC is compensated for acting as the Managing Member of this entity.

57 West Capital Advisors, Inc.'s advisory clients are currently invested in or may be solicited to invest in Texas ColdWorks, LLC along with Associated Persons of 57 West Capital Advisors, Inc. No advisory fees are assessed for assets invested in Texas ColdWorks, LLC. Investors to whom this private offering is made will receive a Subscription and Limited Liability Company Agreements, and other relevant offering documents. Please refer to the offering documents for a complete description of the fees, conflicts of interest, investment objectives, risks, and other important information associated with investing in this company.

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

57 West Capital Advisors, Inc. requires of all its personnel compliance with all applicable securities laws, the laws of the United States as well as its own policies. The company has in place a written internal compliance manual. For purposes of reviewing and ensuring compliance with these laws and policies on a periodic basis 57 West Capital Advisors, Inc. has designated an individual compliance officer responsible for this duty.

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

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

ITEM 12 – BROKERAGE PRACTICES

Clients may direct brokerage to a specified broker-dealer other than the firm suggested by 57 West Capital Advisors, Inc. In these situations, it is up to the client to negotiate the commission rate, as 57 West will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker-dealer used by 57 West. Additionally, the client will not be able to participate in any block trades placed by the firm. Where the client does not otherwise designate a broker-dealer, 57 West Capital Advisors, Inc. a broker-dealer. Where the client does not otherwise designate a broker-dealer, 57 West Capital Advisors, Inc. may suggest a brokerdealer.

Other than execution of trades, 57 West Capital Advisors, Inc. does not use information, research or any other services provided by client brokers in determining investment, trading and advisory decisions. Therefore the advisor does not obtain economic benefits from the different brokers selected by clients. However, when clients open accounts with TD Ameritrade Institutional or Interactive Brokers, the advisor has the facility of viewing and managing all the accounts from one platform facilitating the work and saving time in the actual reviews of the accounts and the execution of trades.

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

Ameritrade Institutional or Interactive Brokers will be notified of the amount of each trade for each account.

ITEM 13 – REVIEW OF ACCOUNTS

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

Clients receive written monthly statements, with an evaluation of their portfolio performance as compared to the Standard and Poor's 500 Index, or a selected total asset class index.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

57 West Capital Advisors, Inc. pays for referrals to persons both in the United States and in foreign countries. These persons are not supervised by the company.

57 West Capital Advisors, Inc. will compensate investment adviser representatives who may or may not be supervised by the company for referrals.

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

ITEM 15 - CUSTODY

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

We are also deemed to have custody of client funds and securities due to our affiliation with Texas ColdWorks, LLC (described in further detail under Item 10 above). The Managing Member of Texas ColdWorks, LLC has retained an independent certified public accountant to conduct an annual audit of the pooled investment vehicle and the audited financial statements are distributed to the investors in Texas ColdWorks, LLC.

ITEM 16 – INVESTMENT DISCRETION

57 West Capital Advisors, Inc. accepts opening client accounts with discretionary authority. In order for the advisor to have discretionary authority over a client account the client previously needs to sign a limited power of attorney. This authorization is also stated in the written agreement between the advisor and each client. In the written agreement a client may limit the authorization in regards to the types of investments the advisor may carry out in the account. Customarily few if any restrictions have been placed on the advisor. 57 West Capital Advisors, Inc. also accepts opening nondiscretionary accounts. In these instances, the client must approve trades in the account before they take place.

ITEM 17 – VOTING CLIENT SECURITIES

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

ITEM 18 – FINANCIAL INFORMATION

57 West Capital Advisors, Inc. does not solicit prepayments or upfront fees of any kind. 57 West Capital Advisors, Inc. and Juan Gabriel Garcés have no financial commitments which impair their ability to meet their advisory agreements and obligations to clients.

ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

Juan Gabriel Garcés, president of 57 West Capital Advisors, Inc., has been in the investment service business for over 40 years. Before founding this investment company in 1999, he founded two broker/dealers, an investment bank, and cofounded a stock exchange in South America.

57 West Capital Advisors, Inc. operates only in the investment advisory business. Juan Gabriel Garces dedicates about two-thirds of his time to managing 57 West Capital Advisors, Inc. In addition the remaining one-third of his time is dedicated to managing 57 West Capital Partners, Inc., an offshore company which owns 100% of 57 West Capital Advisors, Inc. This company provides investment advisory services and business consultancy services worldwide.

Juan Sebastián Garcés and Taylor Michael Tucker are the only additional state registered advisers for 57 West Capital Advisors, Inc. They dedicate 80% of their time to providing services for 57 West Capital Advisors, Inc. The rest of their time is spent on personal business matters, not related to the activities of 57 West Capital Advisors, Inc.



Form ADV Part 2B – Brochure Supplement

February 20, 2020

This Brochure Supplement provides information about Juan Gabriel Garces, that supplements the Investment 57 West Capital Advisors, Inc. (hereinafter "57WCA") Brochure. You should have received a copy of that Brochure. Please contact our office at 512-346-9705 if you did not receive IASN's Brochure or if you have any questions about the contents of this supplement.

Additional information about Juan Gabriel Garces is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>

Juan G. Garces CRD#: 4614691

57 West Capital Advisors, Inc. 11615 Angus Rd. Ste. 104-K Austin, TX 78759

Phone: 512-346-9705 **Email:** jg@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Juan Gabriel Garces Year of Birth: 1954

Business Background for the Previous Five Years:

- 57 West Capital Advisors, Inc., President, Board Member and Chief Compliance Officer/Investment Adviser Representative, 01/1999 to Present.
- Chief Compliance Officer since 01/2019
- 57 West Capital Partners, Inc. President and Board Member, 06/1998 to Present.

DISCIPLINARY INFORMATION - ITEM 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Juan Gabriel Garces and 57 West Capital Advisors, Inc. Mr. Garces has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Mr. Garces is the President of 57 West Capital Partners, Inc., an offshore company, also registered with the Secretary of State in Texas, which owns 100% of 57 West Capital Advisors, Inc. This company provides business consultancy services worldwide as well as invest its own capital in private and publicly traded companies. Juan Gabriel Garces dedicates about two-thirds of his time to managing 57 West Capital Advisors, Inc. In addition the remaining one-third of his time is dedicated to managing 57West Capital Partners, Inc. and its activities. Through 57 West Capital Partners, In. the company owns a 25% stake in Bedrock Capital Partners LLC which is the general partner of Texas Coldworks LLC, a real estate development project in Austin Texas. 57 WCP also has an additional direct investment in Texas ColdWorks LLC. Additionally clients of 57 West Capital Advisors, Inc. also have investments in Texas ColdWorks LLC which could create conflicts of interest.,

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

ADDITIONAL COMPENSATION – ITEM 5

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

SUPERVISION - ITEM 6

Mr. Garces is an investment adviser representative of 57WCA. In this role Mr. Garces is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Garces is also the Chief Compliance Officer of 57WCA. In this capacity, Mr. Garces is responsible for the implementation of the firm's compliance program.

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

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

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

Disciplinary Information

Mr. Garces has not been involved in any reportable disciplinary events.

Bankruptcy Petition

Mr. Garces has not be subject to a bankruptcy petition.



Form ADV Part 2B – Brochure Supplement

February 20, 2020

This Brochure Supplement provides information about Juan Sebastian Garces, that supplements the Investment 57 West Capital Advisors, Inc. (hereinafter "57WCA") Brochure. You should have received a copy of that Brochure. Please contact our office at 512-346-9705 if you did not receive IASN's Brochure or if you have any questions about the contents of this supplement.

Additional information about Juan Sebastian Garces is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>

Juan Sebastian Garces CRD#: 6580033

57 West Capital Advisors, Inc. 11615 Angus Rd. Ste. 104-K Austin, TX 78759

Phone: 512-346-9705 **Email:** sg@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Juan Sebastian Garces Year of Birth: 1984

Business Background for the Previous Five Years:

- 57 West Capital Advisors, Inc. Investment Adviser Representative, 12/2015 to Present.
- 57 West Capital Advisors, Inc. Director of Marketing, 09/2012 to Present

DISCIPLINARY INFORMATION - ITEM 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Juan Sebastian Garces and 57 West Capital Advisors, Inc. Mr. Garces has no history of legal or disciplinary events.

OTHER BUSINESS ACTIVITIES - ITEM 4

Juan Sebastian Garces is a board member of 57 West Capital Partners, Inc., an offshore company which owns 100% of 57 West Capital Advisors, Inc. This company provides business consultancy services worldwide as well as invest its own capital in private and publicly traded companies. Mr. Garces spends the majority of his professional time in his various capacities at 57 West Capital Advisors, Inc.

ADDITIONAL COMPENSATION – ITEM 5

Juan Sebastian Garces does not receive additional compensation or economic benefits from third party sources in connection to his advisory activities.

SUPERVISION - ITEM 6

The Chief Compliance Officer (CCO) of 57WCA, Juan Gabriel Garces, is responsible for the implementation of the firm's compliance program. The CCO supervises Juan S. Garces in his role as an investment adviser representative of 57WCA. In this role Juan S. Garces is responsible for the monitoring of client portfolios for investment objectives and other supervisory reviews. Juan S. Garces is required to attend regular compliance meetings, in which employees are informed and educated about industry compliance topics and practices. 57WCA has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to clients. The CCO ensures all employees adhere to 57WCA's code of ethics and compliance manual as mandated. Clients may contact the CCO at the phone number listed on the cover of this Brochure Supplement, to obtain a copy of 57WCA's code of ethics.

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

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

Disciplinary Information

Juan Sebastian Garces has not been involved in any reportable disciplinary events.

Bankruptcy Petition

Juan Sebastian Garces has not be subject to a bankruptcy petition.



Form ADV Part 2B – Brochure Supplement

February 20, 2020

This Brochure Supplement provides information about Taylor M. Tucker, that supplements the Investment 57 West Capital Advisors, Inc. (hereinafter "57WCA") Brochure. You should have received a copy of that Brochure. Please contact our office at 512-346-9705 if you did not receive IASN's Brochure or if you have any questions about the contents of this supplement.

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

Taylor M. Tucker CRD#: 5941937

57 West Capital Advisors, Inc. 11615 Angus Rd. Ste. 104-K Austin, TX 78759

Phone: 512-346-9705 **Email:** tt@57west.us

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE - ITEM 2

Taylor M. Tucker Year of Birth: 1988

Business Background for the Previous Five Years:

- 57 West Capital Advisors, Inc., Investment Adviser Representative, 06/2018 to Present.
- 57 West Capital Advisors, Inc., Director of Operations, 09/2017 to Present.
- Nylife Securities LLC, Registered Service Assistant, 03/2017 to 09/2017
- Nylife Securities LLC, Financial Services Professional, 02/2015 to 03/2017

DISCIPLINARY INFORMATION - ITEM 3

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

OTHER BUSINESS ACTIVITIES - ITEM 4

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

ADDITIONAL COMPENSATION – ITEM 5

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

SUPERVISION - ITEM 6

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

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

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

REQUIREMENTS FOR STATE-REGISTERED ADVISERS - ITEM 7

Disciplinary Information

Taylor M. Tucker has not been involved in any reportable disciplinary events.

Bankruptcy Petition

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