

# TRIEX FINANCIAL SERVICES, Inc.

SEC File Number: 801 ó 72663

IARD/CRD # 158822

# TRIEX FINANCIAL SERVICES, INC.

## Brochure

**Dated 03/31/2022**

Contact: Gary Bertacchi, Chief Compliance Officer  
10470 W. 163<sup>rd</sup> Place  
Orland Park, IL 60467  
[www.triexfin.com](http://www.triexfin.com)

**This brochure provides information about the qualifications and business practices of Triex Financial Services, Inc. (the “Registrant”). If you have any questions about the contents of this brochure, please contact us at (708)645-8600 or [gary@triexfin.com](mailto:gary@triexfin.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Triex Financial Services, Inc. is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**References herein to Triex Financial Services, Inc. as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.**

## **Item 2 Material Changes**

Since filing its Other-Than-Annual Amendment in April 2013, there have been no material changes to the Triex Financial Services, Inc. disclosure brochure

## **Item 3 Table of Contents**

Item 1	Cover Page .....	1
Item 2	Material Changes .....	2
Item 3	Table of Contents .....	2
Item 4	Advisory Business .....	3
Item 5	Fees and Compensation .....	5
Item 6	Performance-Based Fees and Side-by-Side Management .....	6
Item 7	Types of Clients .....	6
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss .....	7
Item 9	Disciplinary Information .....	9
Item 10	Other Financial Industry Activities and Affiliations .....	9
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	10
Item 12	Brokerage Practices .....	10
Item 13	Review of Accounts .....	12
Item 14	Client Referrals and Other Compensation .....	12
Item 15	Custody .....	13
Item 16	Investment Discretion .....	13
Item 17	Voting Client Securities .....	14
Item 18	Financial Information .....	14

## Item 4 Advisory Business

A. The Registrant is a corporation formed on November 14, 2006 in the State of Illinois. The Registrant became registered as an Investment Adviser Firm in August 2011. The Registrant is 85% owned by Gary Bertacchi. Mr. Bertacchi is the Registrant's President and CEO.

B. As discussed below, the Registrant offers to its clients (individuals, pension and profit sharing plans, trusts, estates and charitable organizations, etc.) investment advisory services relative to its proprietary mutual fund/exchange traded fund allocation strategies. The Registrant **does not** hold itself out as providing financial planning, estate planning or accounting services.

## INVESTMENT ADVISORY SERVICES

### Triex Financial Services, Inc. Investment Management Services

The Registrant shall manage, on a discretionary fee basis: (1) individual accounts, pursuant to which the Registrant shall generally allocate the client's investment assets among different asset allocation strategies, including: (a) Active NDX Strategy, (b) Active SPX Strategy, (c) Active Technical Strategy; (2) individual accounts, pursuant to which the Registrant shall generally allocate the client's investment assets among different asset allocation strategy blends, including: (a) Conservative, (b) Moderate, and (c) Aggressive strategy allocation blends. Each individually selected blend represents a diversified allocation between a selection of the Registrant's investment strategies. The Registrant shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by the Registrant. The current annual investment management fee is 2.50%.

## MISCELLANEOUS

**Limited Consulting/Implementation Services.** Although the Registrant does not hold itself out as providing financial planning, estate planning or accounting services, to the extent specifically requested by the client, the Registrant *may* provide limited consultation services to its investment management clients on investment and noninvestment related matters, such as estate planning, tax planning, insurance, etc. Registrant shall not receive any separate or additional fee for any such consultation services. Neither the Registrant, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of the Registrant's services should be construed as same. To the extent requested by a client, the Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant.

**Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

**Please Also Note:** It remains the client's responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

**Account Management Services.** The Registrant may provide separate account management services (which may involve various investment-related strategies, including separate account managers) for certain clients in accordance with the terms and conditions of the written agreement between the Registrant and the client.

**Sub-Advisory Arrangements.** The Registrant may engage sub-advisors for the purpose of assisting the Registrant with the management of its client accounts. The sub-advisor(s) shall have discretionary authority for the day-to-day management of the assets that are allocated to it by the Registrant. The sub-advisor shall continue in such capacity until such arrangement is terminated or modified by the Registrant. The Registrant shall pay a portion of the investment advisory fee received for these allocated assets to the sub-advisor for its sub-advisory services. The Registrant's Chief Compliance Officer, Gary Bertacchi, remains available to address any questions concerning the Registrant's sub-advisory arrangements.

**Please Note: Inverse/Enhanced Market Strategies.** The Registrant may utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be **no assurance** that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct the Registrant, in writing, not to employ any or all such strategies for his/her/their/its accounts.

**Client Obligations.** In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

**Disclosure Statement.** A copy of the Registrant's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the Investment Advisory Agreement. Any client who has not received a copy of Registrant's written Brochure at least 48 hours prior to executing the Investment Advisory Agreement shall have five business days subsequent to executing the agreement to terminate the Registrant's services without penalty.

C. The Registrant shall provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment adviser representative will discuss with each client, their particular investment objective(s). The Registrant shall allocate each client's investment assets consistent with their designated investment objective(s). Clients may, at any time, impose restrictions, in writing, on the Registrant's services.

D. The Registrant does not participate in a wrap fee program.

As of December 31, 2021 the Registrant had Assets Under management of \$1,487,363. \$1,487,363 is managed on a discretionary basis and \$0 are managed on a non-discretionary basis.

## **Item 5 Fees and Compensation**

A. The client can only engage the Registrant to provide discretionary investment advisory services on a fee-only basis.

### **INVESTMENT ADVISORY SERVICES**

If a client determines to engage the Registrant to provide discretionary investment advisory services on a fee-only basis, the Registrant's annual investment advisory fee shall be as follows:

#### **Triex Financial Services, Inc, Investment Management Services**

For its investment management Service, the Registrant shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by the Registrant. The current annual investment management fee is 2.50%.

B. Clients may elect to have the Registrant's advisory fees deducted from their custodial account. Both Registrant's Investment Advisory Agreement and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of the Registrant's investment advisory fee and to directly remit that management fee to the Registrant in compliance with regulatory procedures. In the limited event that the Registrant bills the client directly, payment is due upon receipt of the Registrant's invoice. Unless otherwise indicated in the Investment Advisory Agreement between the Registrant and the client, the Registrant shall deduct fees and/or bill clients quarterly in arrears, based upon the average daily market value of the assets during the previous quarter.

C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, the Registrant shall generally recommend that Charles Schwab and Co., Inc. (Schwab), Ceros (Ceros), Guggenheim Funds, ProFunds (ProFunds), or the specific mutual fund that issued the mutual fund serve as the broker-dealer/custodian for client investment management assets. Broker dealers and funds such as Schwab, Ceros, Guggenheim, and Profunds charge broker dealer/custodian custody fees, brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to Registrant's investment management fee, broker dealer/custodian custody fees, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

D. Registrant's annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the average daily market value of the assets during the previous quarter. The Registrant generally requires a minimum investment of \$10,000 per investment program. Registrant, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its minimum investment requirement based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

The Investment Advisory Agreement between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Investment Advisory Agreement. Upon termination, Registrant's investment management fee shall be pro-rated through the date of termination, and either debited from the client account or directly billed to the client.

E. Neither the Registrant, nor its representatives accept compensation from the sale of securities or other investment products.

## **Item 6 Performance-Based Fees and Side-by-Side Management**

Rule 205-3 of the Investment Advisers Act of 1940 permits a registered investment adviser to enter into a performance fee agreement with certain sophisticated clients who have the capacity to bear the potential additional risks of such a fee arrangement. An adviser can rely on Rule 205-3 only if the performance fee agreement is with "eligible" clients. Eligible clients are defined in the Rule as natural persons and companies that have either at least \$750,000.00 under management with the Registrant immediately after entering into a performance fee agreement or a net worth at the time the agreement is entered into in excess of \$1.5 Million (i.e. a natural person's net worth may include assets held jointly with a spouse). On an extremely limited basis, Registrant may enter into performance fee compensation arrangements with eligible clients in accordance with the requirements of Rule 205-3 under the Investment Advisers Act of 1940. In such limited circumstances, the client is informed of a potential conflict of interest in that the performance fee arrangement may be an incentive for the Registrant to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement. Because Registrant and its representatives manage client accounts that charge both an asset-based fee and/or a performance based fee, this arrangement may create a **conflict of interest**, as Registrant and its representatives have an incentive to favor investments where Registrant receives both an asset-based fee and a performance fee.

**The Registrant's Chief Compliance Officer, Gary Bertacchi, remains available to address any questions regarding this conflict of interest.**

## **Item 7 Types of Clients**

The Registrant's clients shall generally include individuals, pension and profit sharing plans, trusts, estates and charitable organizations. The Registrant generally requires a minimum investment of \$10,000 per investment program. Registrant, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its minimum investment requirement based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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

A. The Registrant may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical ó (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical ó (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

The Registrant may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)

- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)
- Margin Transactions (use of borrowed assets to purchase financial instruments)
- Options (contract for the purchase or sale of a security at a predetermined price during a specific period of time)

**Please Note: Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Registrant) will be profitable or equal any specific performance level(s).

A. Every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

B. Currently, the Registrant primarily allocates client investment assets among its various mutual fund/exchange traded fund (ETFs) (including inverse ETFs and/or mutual funds that are designed to perform in an inverse relationship to certain market indices) allocation strategies, on a discretionary basis in accordance with the client's designated investment objective(s). As disclosed above, the Registrant may utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be **no assurance** that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct the Registrant, in writing, not to employ any or all such strategies for his/her/their/its accounts. (*See* Item 4 B).

#### **Investment Strategies:**

#### **Active NDX Strategy:**

The Active NDX Strategy is built on mathematical formulas utilizing multiple moving averages and the percentage changes of these averages. The strategy provides daily signals for being in Long or Inverse Nasdaq 100 market index funds or in a money market fund.

**Active SPX Strategy:**

The Active SPX Strategy is built on mathematical formulas utilizing multiple moving averages, multiple standard deviations and the corresponding percentage changes of both these indicators. The strategy provides daily signals for being in Long or Inverse S&P500 market index funds or in a money market fund.

**Active Technical Strategy:**

The Active Technical Strategy is built on quantum mechanics theories in conjunction with technical charting techniques. The strategy provides daily signals for being in Long or Inverse index funds depending on the charts for the index or in a money market fund.

Triex's Active NDX and Active SPX strategy offer portfolios that have been constructed to achieve a given risk and return profile: conservative, moderate and aggressive. The conservative strategy seeks a conservative level of total return (5-10%) consistent with a conservative level of risk (<5%). The moderate strategy seeks a moderate level of total return (10%-15%) consistent with a moderate level of risk (<10%). The aggressive strategy seeks an aggressive level of total return (>15%) consistent with an aggressive level of risk (<15%).

**Please Note:** There can be no assurance that the Registrant's strategies will be correct or successful or will meet the risk and return objectives stated above. Registrant's strategies have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940.

**Short Strategy.** Registrant's Active NDX Strategy, Active SPX Strategy and Active Technical Strategy also enable the Registrant, when it deems appropriate upon its receipt of a sell signal, to invest in inverse mutual funds and ETFs that effectively "short" the equity markets. The Registrant may utilize a "short" strategy with intent to profit in a perceived declining high yield market. However, there can be no assurance that the Registrant's signals or the short strategy(s) will be correct or successful.

Registrant's asset allocation strategies have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, such as Registrant's asset allocation programs, with a non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is applicable to Registrant's management of client assets:

1. Initial Interview ó at the opening of the account, the Registrant, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives;
2. Individual Treatment - the account is managed on the basis of the client's financial situation and investment objectives;
3. Annual Contact ó at least annually, the Registrant shall contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
4. Consultation Available ó the Registrant shall be reasonably available to consult with the client relative to the status of the account;



5. Quarterly Report ó the client shall be provided with a quarterly report for the account for the preceding period;
6. Ability to Impose Restrictions ó the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct the Registrant not to purchase certain mutual funds;
7. No Pooling ó the client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account;
8. Separate Account - a separate account is maintained for the client with the Custodian;
9. Ownership ó each client retains indicia of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

The Registrant believes that its annual investment management fee is reasonable in relation to: (1) the advisory services provided under the Investment Advisory Agreement; and (2) the fees charged by other investment advisers offering similar services/programs. However, Registrant's annual investment management fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to Registrant's annual investment management fee, the client will also incur charges imposed directly at the mutual and exchange traded fund level (e.g., management fees and other fund expenses).

**Please Note:** Registrant's investment programs may involve above-average portfolio turnover which could negatively impact upon the net after-tax gain experienced by an individual client in a taxable account.

## **Item 9 Disciplinary Information**

The Registrant does not have any reportable disciplinary information.

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

- A. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. The Registrant does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

Gary Bertacchi, the President and CEO of the Registrant is also President and CEO of a charitable foundation, the Cord Vanderpool Foundation. This activity is non-investment related but Mr. Bertacchi may spend approximately 50% of his time working for the Foundation.

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

A. The Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

B. The Registrant and/or representatives of the Registrant *may* buy or sell securities that are also recommended to clients. This practice may create a situation where the Registrant and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that an Access Person of the Registrant must 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 Registrant selects; provided, however that at any time that the *Firm* has only one Access Person, he or she shall not be required to submit any securities report described above.

C. The Registrant and/or representatives of the Registrant may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons.

## **Item 12 Brokerage Practices**

A. In the event that the client requests that the Registrant recommend a broker dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct the Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at Schwab, Ceros, Guggenheim, and/or Profunds. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Registrant setting forth the terms and conditions under which Registrant shall

manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Factors that the Registrant considers in recommending Schwab, Ceros, Guggenheim, and/or Profunds (or any other broker-dealer/custodian to clients) include historical relationship with the Registrant, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Registrant's clients shall comply with the Registrant's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Registrant determines, in good faith, that the commission/ transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker dealer services, including the value of research provided, execution capability, commission rates, and responsiveness.

Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker dealer/ custodian are exclusive of, and in addition to, Registrant's investment management fee. The Registrant's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

#### 1. Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Registrant may receive from Schwab, Ceros, Guggenheim, and/or Profunds (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist the Registrant to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Registrant may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Registrant in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist the Registrant in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the Registrant to manage and further develop its business enterprise. Registrant's clients do not pay more for investment transactions effected and/or assets maintained at Schwab, Ceros, Guggenheim, and/or Profunds as a result of this arrangement. There is no corresponding commitment made by the Registrant to Schwab, Ceros, Guggenheim, and/or Profunds or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**The Registrant's Chief Compliance Officer, Gary Bertacchi, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.**

2. The Registrant does not receive referrals from broker-dealers.

3. The Registrant does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements,

the client will negotiate terms and arrangements for their account with that broker-dealer, and Registrant will not seek better execution services or prices from other broker-dealers or be able to batch the client's transactions for execution through other broker-dealers with orders for other accounts managed by Registrant. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

**Please Note:** In the event that the client directs Registrant to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Registrant.

**The Registrant's Chief Compliance Officer, Gary Bertacchi, remains available to address any questions that a client or prospective client may have regarding the above arrangement.**

B. To the extent that the Registrant provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless the Registrant decides to purchase or sell the same securities for several clients at approximately the same time. The Registrant may (but is not obligated to) combine or bunch such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Registrant's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. The Registrant shall not receive any additional compensation or remuneration as a result of such aggregation.

### **Item 13 Review of Accounts**

A. For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on an ongoing basis by one of the Registrant's Principals. All investment supervisory clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review investment objectives and account performance with the Registrant on an annual basis.

B. The Registrant *may* conduct account reviews on another than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

C. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/trust company/mutual fund/custodian for the client accounts. Those clients to whom Registrant provides investment supervisory services will also receive a report from the Registrant summarizing account activity no less than quarterly.

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

A. As referenced in Item 12.A.1 above, the Registrant may receive an indirect economic benefit from Schwab, Ceros, Guggenheim, and/or Profunds. The Registrant, without cost (and/or at a discount), may receive support services and/or products from Schwab, Ceros, Guggenheim, and/or Profunds. Registrant's clients do not pay more for investment transactions effected and/or assets maintained at Schwab, Ceros,

Guggenheim, and/or Profunds as a result of this arrangement. There is no corresponding commitment made by the Registrant to Schwab, Ceros, Guggenheim, and/or Profunds or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**The Registrant's Chief Compliance Officer, Gary Bertacchi, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.**

B. If a client is introduced to the Registrant by either an unaffiliated or an affiliated solicitor, Registrant may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Except as disclosed below, any such referral fee shall be paid solely from the Registrant's investment advisory fee, and shall not result in any additional charge to the client. If the client is introduced to the Registrant by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of the Registrant's written Brochure, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between the Registrant and the solicitor, including the compensation to be received by the solicitor from the Registrant. Any affiliated solicitor of the Registrant shall disclose the nature of his/her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Registrant's written Brochure.

The Registrant may receive client referrals from unaffiliated investment advisers, pursuant to which the Registrant shall compensate such referring advisers with a portion of the Registrant's investment advisory fee. With respect to client engagements that derive from such referrals, the Registrant may engage the services of an unaffiliated investment manager to assist the Registrant with the investment management process.

## **Item 15 Custody**

The Registrant shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/trust company/mutual fund/custodian for the client accounts. Those clients to whom Registrant provides investment supervisory services will also receive a report from the Registrant summarizing account activity no less than quarterly.

**Please Note:** To the extent that the Registrant provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Registrant with the account statements received from the account custodian.

**Please Also Note:** The account custodian does not verify the accuracy of the Registrant's advisory fee calculation.

## **Item 16 Investment Discretion**

The client can determine to engage the Registrant to provide investment advisory services on a discretionary basis. Prior to the Registrant assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming the Registrant as the client's attorney and agent in fact, granting the Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Registrant on a discretionary basis may, at any time, impose restrictions, **in writing**, on the Registrant's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Registrant's use of margin, etc.).

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

A. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Registrant served as an advisor to the Triex Tactical Long/Short Fund. Registrant has adopted proxy voting policies and procedures as required by Rule 206(4)-6 of the Investment Advisers Act of 1940. These policies and procedures were effective on June 22, 2011. As a matter of policy and as a fiduciary, Registrant has responsibility for voting proxies for portfolio securities consistent with the best economic interests of the Fund, portfolios and clients. Registrant maintains written policies and procedures as to the handling, research, voting and reporting of proxy voting and makes appropriate disclosures about our firm's proxy policies and practices. Registrant's policy and practice includes the responsibility to monitor corporate actions, receive and vote client proxies and disclose any potential conflicts of interest as well as making information available to clients about the voting of proxies for their portfolio securities and maintaining relevant and required records.

B. Unless set forth in Item 17.A above to the contrary, clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Registrant to discuss any questions they may have with a particular solicitation.

### **Item 18 Financial Information**

A. The Registrant does not solicit fees in advance.

B. The Registrant is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

C. The Registrant has not been the subject of a bankruptcy petition.

**ANY QUESTIONS: The Registrant's Chief Compliance Officer, Gary Bertacchi, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**

A.

**Gary R. Bertacchi**

Triex Financial Services, Inc.

Brochure Supplement

Dated 03/31/2022

Contact: Cary Bertacchi, Chief Compliance Officer  
10470 W. 163<sup>rd</sup> Place  
Orland Park, IL 60467

B.

**This brochure supplement provides information about Gary R. Bertacchi that supplements the Triex Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Gary Bertacchi, Chief Compliance Officer if you did *not* receive Triex Financial Services, Inc's brochure or if you have any questions about the contents of this supplement. Additional information about Gary R. Bertacchi is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Gary R. Bertacchi was born in 1957. Mr. Bertacchi graduated from DePaul University in 1979, with a Bachelor of Science degree in Commerce. Mr. Bertacchi graduated from John Marshall Law School in 1985 with a Juris Doctor degree. Mr. Bertacchi holds a Series 66 securities license. Mr. Bertacchi has been President of Triex Financial Services, Inc. since 2006. Mr. Bertacchi has also been the President and CEO of The Cord Vanderpool Foundation, a Private Foundation, since 2008. Mr. Bertacchi is also a licensed Private Detective and a licensed Private Security Contractor.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Mr. Bertacchi's role as President and CEO of the aforementioned charitable foundation - The Cord Vanderpool Foundation, is non-investment related but he may spend approximately 50% of his time working for the Foundation.

### **Item 5 Additional Compensation**

None.

### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act (*öActö*). The Registrant's Chief Compliance Officer, Gary Bertacchi, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee or investment adviser representative of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Bertacchi can be reached at (708) 645-8600.