

PROMUS ADVISORS

Investment Advisor Brochure

Form ADV Part 3 Client Relationship Summary for Clients of:

Promus Advisors
8226 Douglas Avenue, Suite 650
Dallas, Texas 75225
214-612-5750

March 1, 2025

Dear Client:

This Brochure provides information about the qualifications and business practices of Promus Advisors. If you have any questions about the contents of this Brochure, please contact Joshua J. Prince, President of Promus Advisors at 214-612-5750.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by the Texas State Securities Board (“TSSB”). Promus Advisors is a SEC registered investment advisor and notice filed with the State of Texas and other states as applicable. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you may determine to hire or retain an Advisor.

Additional information about Promus is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Promus Advisors is 157484. Additional information about Joshua J. Prince, President as a supervised and management person, and any financial advisor representing Promus, is available on FINRA’s Broker Check website at www.finra.org/Investors/ToolsCalculators/BrokerCheck.

Promus is a Texas based investment management and advisory firm providing comprehensive investment management services to individuals, businesses, trusts, estates, retirement plans, endowments and foundations. The firm has no established minimum account size however a minimum annual management fee is applicable.

Thank you for choosing Promus.

Respectfully yours,

Joshua J. Prince

Joshua J. Prince

President, Chief Compliance Officer

Promus Advisors

Robert D. Sewell

Robert D. Sewell

CEO

Form ADV Part 3 – Client Relationship Summary

PROMUS ADVISORS

Date: As of December 31, 2024

Promus Advisors is an investment adviser registered with the Securities and Exchange Commission offering advisory and management account services. Please know that brokerage and investment advisory services and fees differ, it is important for you to understand the differences. This document gives you a summary of the types of services we offer and their corresponding fees. Please visit www.investor.gov/CRS for free, simple tools to research firms and financial professionals and for educational materials about broker-dealers, investment advisers, and investing.

We offer investment advisory services to retail clients through separately managed accounts or third-party managed accounts. Joshua J. Prince is President and Manager who conducts reviews of client portfolios. Promus works with its clients to accomplish their goals through integrity, independence and objectivity. As of December 31, 2024, the firm has assets under management of \$415,008,378 for 269 accounts.

What investment services and advice can you provide me?

Promus Advisors offers discretionary and non-discretionary advisory services, including but not limited to, investment management, financial planning: personal tax and cash flow planning, estate planning, insurance planning, marriage and divorce planning, college planning, compensation and benefits planning, investment consulting for asset allocation, portfolio diversification, portfolio risk, and the preparation of financial analyses and personal financial statements reflecting net worth, cash flow, and income tax projections. Financial planning services may be provided as a stand-alone service or as part of Promus' investment advisory services.

Investments are guided by the objectives and any restrictions outlined in each client's investment management agreement (IMA) or investment policy statement (IPS).

When we act as your discretionary investment manager, you give us authority to make investment and trading decisions for your account without asking for your approval in advance. With this authority, we are responsible for the strategy's security selection and weightings, as well as buying and selling securities in your account. You can put reasonable restrictions on our management of your account.

Promus Advisors will select third party managers for portfolio allocation. Third-party investment managers recommended to clients will have full investment discretion and trading authority over that portion of a client's account and shall have sole responsibility for the implementation of the third-party strategy's investment objectives. With respect to the assets held in portfolios managed by third-party investment managers, Promus Advisors will not place orders for transactions in that portion of the client's account or otherwise exercise trading authority over the third-party account.

Promus Advisors routinely monitors the third-party investment managers by a meritocratic management approach. This method emphasizes selection, promotion (or termination), and evaluation of managers based on their demonstrable abilities, performance metrics, and ongoing results.

We also perform account monitoring, including contributions/ withdrawals, custodian reconciliations, and service requests such as tax loss harvesting

Promus Advisors may recommend alternative investments such as pooled investment vehicles, hedge funds, private equity funds, limited partnerships, active or passive portfolio strategies offered through its non-US affiliate,

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Bellwether Investment Management, Inc. (“Bellwether”). These portfolios may be traded through an affiliate investment adviser of Bellwether. You will pay a fee to Bellwether in addition to those charged by Promus.

Questions to ask us: [Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?](#)

[What fees will I pay?](#)

Promus Advisors charges an asset-based fee using a tiered fee schedule. Regardless of the size of a client’s assets under management with Promus, the minimum annual investment management fee is \$5,000.00 per annum. Promus may elect to receive a fixed fee or a percentage of assets under management for its investment management fee, on any product, or other services performed by Promus. In certain unique instances, an alternative fee may be negotiated with a client depending on the services to be provided. Investment management fees are charged quarterly in advance. Please see Items 5 & 6 of our Part 2 Brochure for details on our portfolio management fees.

Investment management fees are calculated using a multi-tiered fee schedule with breakpoints that are applied on a blended basis. This blended fee schedule is used to calculate your fee by weighing your aggregate account value for breakpoints. Please see Items 5 & 6 of our Part 2 Brochure for details on our portfolio management fees.

Householding: Client may elect to aggregate the amounts in the accounts held directly by Client or for the benefit of a spouse, parent, child, or any extended family member for fee calculation purposes. These accounts are deemed to be in the same “Household” and the aggregation process is referred to as “householding” related aggregated accounts. Householding related accounts may collectively qualify the accounts for a fee breakpoint and elimination of minimum fee. The fee breakpoints are set forth in the fee schedules above based on the account value. Householding related accounts does not authorize others in Client’s household to conduct transactions in Client’s account.

Third Party Costs: In addition to the fees charged by Promus Advisors, clients may be responsible for additional expenses, such as brokerage fees, commissions, mark-ups and mark-downs, custody fees, tax preparation fees and fees and expenses charged by unaffiliated custodians, as well as investment management fees charged by third-party mutual funds, pooled investment vehicles, and third-party managers. Account assets invested in these types of investment vehicles will be included in calculating the value of the account for purposes of computing the fee Promus Advisors charges for the investment advisory services it provides, and the same assets will also be subject to additional fees and expenses, as set forth in the offering documents of those investment vehicles, including, for example, third party manager fees, if applicable. Item 5 of our Part 2 Brochure provides more details.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Questions to ask us: [Help me understand how these fees and costs might affect my investments. If I give you \\$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?](#)

[What are your legal obligations to me when acting as my investment adviser?](#)

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of you. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

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- When permitted by your investment guidelines, and subject to applicable law, regulations and exemptions, from time to time we recommend a strategy offered by our non-US affiliate in which our non-US affiliate acts as a manager. Our non-US affiliate typically receives a benefit in the form of management, or other fees in addition to Promus' management fee.
- When we manage another account that pays or could potentially pay higher fees and invests in the same or similar strategy or assets, we have an incentive to favor the other account, for example, in allocation and execution of investment opportunities. Promus Advisors has a fiduciary duty it owes to its clients, consisting of two components, a duty of loyalty and a duty of care. Promus Advisors' Part 2 Brochure includes more information about our fiduciary duty to our clients.

How else does your firm make money and what conflicts of interest do you have?

The amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets to increase our fee. For example, a recommendation by us to rollover a 401(k) plan to an IRA under management with us constitutes a conflict of interest.

Similarly, Promus Advisors and Bellwether are affiliated but organized separately. Bellwether is a non-US affiliate with business interests that could conflict with the interests of Promus Advisors, creating a conflict of interest due to their interconnected relationship; however, independent decision-making processes are present. Promus Advisors conducts periodic reviews to identify conflicts of interest to ensure compliance with relevant regulations in each jurisdiction where Promus Advisors operates. Promus Advisors' Part 2 Brochure includes helpful information to understand various conflicts.

Promus Advisors may recommend a portfolio strategy managed by its non-US affiliate, Bellwether, who charges a fee in addition to Promus Advisors' management fee. In addition, the portfolio strategy may trade through an affiliate of Bellwether where additional fees may exist.

Question to ask us: [How might your conflicts of interest affect me, and how will you address them?](#)

How do your financial professionals make money?

Our financial professionals are compensated based on a salary/bonus structure and, in some years, based on the profitability of the firm (see the conflicts listed in the paragraph immediately above). We do not receive economic benefits from any other person or entity in connection with providing investment advice to clients. Please also see Item 10 of our Part 2 Brochure for additional details.

Do you or your financial professionals have legal or disciplinary history? No. We do not have legal and/or disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Questions to ask us: [As a financial professional, do you have any disciplinary history? For what type of conduct?](#)

For additional information on our advisory services, see our Part 2 Brochure available at <https://adviserinfo.sec.gov/firm/summary/157484> and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 214.612.5750.

Questions to ask us: [Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?](#)

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Date: As of December 31, 2024

Exhibit A – Material Changes to Client Relationship Summary

December 30, 2022

Promus Asset Management LLC d/b/a Promus Advisors (Promus Advisors) sold 80% of its membership interests to Bellwether Investment Management USA Inc., a subsidiary of Lorne Park Capital Partners Inc. (LPCP). LPCP is a publicly traded company listed on the Toronto Stock Exchange (TSE: LCP). LPCP's affiliate, Bellwether Investment Management Inc., a subsidiary of LPCP, is a registered investment adviser in the provinces of Alberta, British Columbia, Manitoba, Nova Scotia, Ontario, Quebec, Saskatchewan, and Prince Edward Island, an exempt market dealer in Alberta, Ontario and Quebec, and an investment fund manager in Ontario and Quebec. Promus Advisors is a division of Bellwether USA and will continue to operate as the SEC registered investment adviser. Additional information about Promus Advisors is available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any person affiliated with Promus Advisors who are registered, or are required to be registered, as investment advisor representatives of Promus Advisors.

As of December 31, 2024

Cross Border Registrations

Promus Advisors is approved as an international adviser exempt from registration in the province/territories of Ontario, Canada, under the Ontario Securities Commission (OSC) and Alberta, Canada, under the Alberta Securities Commission (ASC). Additional information about Promus Advisors is available on the Canadian Securities Administrators' website at <https://www.securities-administrators.ca/nrd/>. You can search this site by a unique identifying number, known as a NRD number. The NRD number for Promus Advisors is 81690.