

# Frisco Business Solutions Group Inc dba FBS Securities Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Frisco Business Solutions Group Inc DBA FBS Securities. If you have any questions about the contents of this brochure, please contact us at (214) 307-4320 or by email at: [info@fbsgroup.co](mailto:info@fbsgroup.co). 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 Frisco Business Solutions Group Inc DBA FBS Securities is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Frisco Business Solutions Group Inc DBA FBS Securities' CRD number is: 326538.*

3900 S Stonebridge Dr Suite 1104  
McKinney, TX 75070  
(214) 307-4320  
[info@fbsgroup.co](mailto:info@fbsgroup.co)  
<https://www.fbsgroup.co>

*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 04/28/2026

## Item 2: Material Changes

The material changes in this brochure since the last updating amendment include:

**Digital Asset SMAs:** The firm now offers Digital Asset Separately Managed Accounts (SMAs) utilized through Coinbase Prime.

**Outside Business Activities:** Updated Item 10 to reflect the Principal's affiliation with an outside Private Fund Management/General Partner entity.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes	ii
Item 3: Table of Contents	iii
Item 4: Advisory Business	4
Item 5: Fees and Compensation	7
Item 6: Performance-Based Fees and Side-By-Side Management	11
Item 7: Types of Clients	11
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss	11
Item 9: Disciplinary Information	16
Item 10: Other Financial Industry Activities and Affiliations	17
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	19
Item 12: Brokerage Practices	20
Item 13: Review of Accounts	21
Item 14: Client Referrals and Other Compensation	21
Item 15: Custody	22
Item 16: Investment Discretion	23
Item 17: Voting Client Securities (Proxy Voting)	23
Item 18: Financial Information	23
Item 19: Requirements For State Registered Advisers	24

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Frisco Business Solutions Group Inc DBA FBS Securities (hereinafter "FBS Securities") is a Corporation organized in the State of Texas. The firm was formed in January 2015 and became registered as an investment adviser in June 2023. The principal owner is Venugopal Ramakrishnappa Reddy.

### B. Types of Advisory Services

#### *Portfolio Management Services*

FBS Securities offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. FBS Securities creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). FBS Securities may employ active trading strategies, including the use of derivatives such as listed options, straddles, and other tactical approaches. These strategies are only recommended where suitable and supported by the client's risk profile and Investment Policy Statement (IPS). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

FBS Securities evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. FBS Securities will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

FBS Securities seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of FBS Securities' economic, investment or other financial interests. To meet its fiduciary obligations, FBS Securities attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, FBS Securities' policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is FBS Securities' policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

## *Selection of Other Advisers*

FBS Securities may engage in the selection of third-party money managers but does not have any such arrangements in place at this time. Before selecting other advisers for clients, FBS Securities will always ensure those other advisers are properly licensed or registered as an investment adviser.

## *Subadvisor Services*

FBS Securities may also act as a subadvisor to advisers unaffiliated with FBS Securities ,but does not have any such arrangements at this time. The third-party advisers would outsource portfolio management services to FBS Securities. This relationship will be memorialized in each contact between FBS Securities and the third-party adviser.

## *Pension Consulting Services*

FBS Securities offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

## *Financial Planning*

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; estate plan reviews; and debt/credit planning.

FBS Securities offers Third Party Administrative (TPA) services to its clients. FBS Securities collaborates with Certified Public Accountants (CPAs), Insurance Agents and other influencers in the solicitation of clients for TPA services and may offer referral fees for businesses/individuals referring entities seeking Third Party Administrative assistance. TPA clients have the option to engage FBS Securities for investment selection and advisory services, although such engagement is not obligatory.

### ***Digital Asset Separately Managed Accounts (SMAs):***

FBS Securities offers SMAs specifically focused on digital assets and cryptocurrencies. These accounts are managed on a discretionary basis via the Coinbase Prime platform. Digital Asset SMAs are strictly reserved for clients whose Investment Policy Statement (IPS) and risk tolerance explicitly support high-risk, highly volatile alternative investments.

### ***Services Limited to Specific Types of Investments***

FBS Securities generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities, venture capital funds, private placements, and digital assets/cryptocurrencies. FBS Securities may use other securities as well to help diversify a portfolio when applicable.

### ***Written Acknowledgement of Fiduciary Status***

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## **C. Client Tailored Services and Client Imposed Restrictions**

FBS Securities offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent FBS Securities from properly servicing the client account, or if the

restrictions would require FBS Securities to deviate from its standard suite of services, FBS Securities reserves the right to end the relationship.

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

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. FBS Securities does not participate in wrap fee programs.

## E. Assets Under Management

FBS Securities has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$45,306,454	\$0	As of December 31 2025

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

*Lower fees for comparable services may be available from other sources.*

Total Assets Under Management	Annual Fees
All Assets	up to 2.00%

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based. Final terms are negotiated and outlined in the client agreement.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of FBS Securities' fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

**Digital Asset SMA Fees:** Assets managed within Digital Asset SMAs on the Coinbase Prime platform are subject to an annual management fee of up to 2.00%, consistent with the standard fee schedule above. Clients are responsible for any separate trading, network, or custody fees imposed directly by Coinbase.

#### *Selection of Other Advisers Fees*

FBS Securities may engage in the selection of third-party money managers but does not have any such arrangements in place at this time. Clients will not be charged a total management fee over the 3% industry average when FBS Securities refers clients to third-party investment advisers.

#### *Subadviser Services Fees*

FBS Securities may also act as a subadviser to unaffiliated third-party advisers but does

not have such arrangements at this time. These relationships will be memorialized in each contract between FBS Securities and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

## *Pension Consulting Services Fees*

### **Asset-Based Fees for Pension Consulting**

<b>Total Assets Under Management</b>	<b>Annual Fees</b>
All Assets	up to 2.00%

The advisory fee is calculated using the value of the assets on the last business day of the prior billing period.

These fees are negotiable and may reflect the complexity, scope of services, and plan size. Final fees will be disclosed in the advisory agreement.

Clients may terminate the agreement without penalty for a full refund of FBS Securities' fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 7 days' written notice. FBS Securities bills based on the balance on the first day of the billing period.

## *Financial Planning Fees*

### **Fixed Subscription Fees**

The fixed fee for financial planning services is \$5,000 per annum. The fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement.

### **Hourly Fees**

The negotiated hourly fee for these services is between \$300 and \$1,500.

Clients may terminate the agreement without penalty, for full refund of FBS Securities' fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

## *Educational Seminars/Workshops*

FBS Securities provides periodic educational seminars and workshops to clients and prospects.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

### ***Payment of Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

### ***Payment of Selection of Other Advisers Fees***

FBS Securities may engage in the selection of third-party money managers, but does not have any such arrangements in place at this time.

### ***Payment of Subadviser Fees***

FBS Securities may also act as a subadviser to unaffiliated third-party advisers, but does not have such arrangements at this time.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check, credit card, and wire.

Fixed financial planning subscription fees are paid quarterly, in advance. FBS Securities does not require prepayment of more than \$500 in fees per client, six months or more in advance.

Hourly financial planning fees are paid in arrears upon completion.

### ***Payment of Educational Seminar/Workshop Fees***

Educational seminars and workshops are currently offered free of charge. However, in the future, FBS Securities may introduce a nominal fee, which will be disclosed in advance. Any fees, if applicable, will be payable in advance and non-refundable.

## **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FBS Securities. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

FBS Securities collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

## **E. Outside Compensation For the Sale of Securities to Clients**

Venugopal Ramakrishnappa Reddy is a licensed insurance agent, and in that role accepts compensation for the sale of investment products to FBS Securities clients.

### ***1. This is a Conflict of Interest***

Supervised persons may accept compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds to FBS Securities' clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, FBS Securities will document the conflict of interest in the client file and inform the client of the conflict of interest.

### ***2. Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase FBS Securities recommended products through other brokers or agents that are not affiliated with FBS Securities.

### ***3. Commissions are not FBS Securities' primary source of compensation for advisory services***

Commissions are not FBS Securities' primary source of compensation for advisory services.

### ***4. Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

## Item 6: Performance-Based Fees and Side-By-Side Management

FBS Securities does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

FBS Securities generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities
- ❖ Other Investment Advisers

There is a recommended account minimum of \$500,000, which may be reduced or waived by FBS Securities at its discretion.

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

FBS Securities' methods of analysis include Fundamental and Technical analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves analyzing statistics generated by market activity, such as past prices, trading volume, sector rotation, and financial indicators.

#### *Investment Strategies*

FBS Securities uses long-term, short-term trading, and options trading (including covered options, uncovered options, straddles or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

### *Investment Strategies*

#### **Investment Strategy Tiers**

FBS Securities distinguishes between standard model portfolios and active trading strategies:

- Model Portfolios are long-term, strategically allocated using diversified ETFs, mutual funds, stocks, and other instruments suitable for risk-adjusted market exposure.
- Active Trading Strategies may include derivatives such as options, straddles, or tactical allocations. These strategies are designed for Qualified Clients with higher risk tolerance. Additional tax exposure, volatility, and liquidity risk are acknowledged.

Clients engaging in these strategies receive additional disclosures and are reviewed quarterly.

**Long-term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Model portfolios** are designed to capture return and risk at market rates. This seeks to provide clients with diversification benefits help to smooth returns, reduce volatility and decrease asset-class and single-strategy risks. Risks specific to using model portfolios include the possibility that the model portfolio will underperform the market and the possibility that the model will not be able take advantage of opportunities that a non-model portfolio management approach might capture. Model portfolios entail inflation (purchasing power) risk, interest rate risk, economic risk, market risk, political/regulatory risk, and asset allocation risk - meaning that any given asset allocation strategy does not guarantee any specific result or profit nor protect against a loss.

**Options** writing or trading involves a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Selection of Other Advisers:** Although FBS Securities will seek to select only money managers who will invest clients' assets with the highest level of integrity, FBS Securities' selection process cannot ensure that money managers will perform as desired and FBS Securities will have no control over the day-to-day operations of any of its selected money managers. FBS Securities would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Tactical Asset Allocation** is an active management portfolio strategy that rebalances percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The

value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and

investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Hedge funds** often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Derivatives** gain their value from another instrument and therefore can result in large losses because of the use of leverage or borrowing. Derivatives allow investors to earn large returns from small movements in the underlying asset's price. However, investors could lose large amounts if the price of the underlying moves against them significantly.

**Private Credit Notes** represent debt securities issued by private entities, which may include direct lending products or private debt instruments tailored to client-specific objectives. Borrowers tend to be smaller and riskier than their public market counterparts. Private credit has higher exposure to legal, operational and counterparty risks. Private credit is often difficult to sell on the secondary market. There is limited transparency of public information about the companies investors lend money to.

**Private equity** funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Structured notes** are debt securities issued by financial institutions with performance linked to an underlying index or indices. Specifically, the return is typically based on a single equity, a basket of equities, equity indices, interest rates, commodities, or foreign currencies. The performance of a structured note is linked to the performance of the underlying investment, so risk factors applicable to that investment will also apply to the structure note. Investing in structured notes also carries liquidity risk, credit risk, and market risk. There is also the risk of capital loss and additional complexity beyond more direct investment in the underlying asset.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Digital Assets and Cryptocurrency:** Investing in digital assets is highly speculative and involves extreme risk, including the potential loss of the entire investment. Digital assets are generally not insured by the Federal Deposit Insurance Corporation (FDIC) or the Securities Investor Protection Corporation (SIPC). Risks include, but are not limited to:

- *Extreme Volatility:* Digital asset prices are highly volatile and can experience massive price swings in a single day.
- *Regulatory Risk:* The regulatory framework for digital assets is constantly evolving; new laws or regulations could materially impact the value or legality of certain assets.
- *Cybersecurity and Custody Risk:* While FBS Securities utilizes institutional platforms like Coinbase Prime, digital assets are vulnerable to hacking, theft, and loss of private keys, which could result in unrecoverable losses.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## Item 9: Disciplinary Information

### A. Criminal or Civil Actions

Neither the firm nor any management persons have been subject to any criminal or civil actions.

## **B. Administrative Proceedings**

Neither the firm nor any management persons have been subject to any administrative proceedings.

## **C. Self-regulatory Organization (SRO) Proceedings**

On July 29, 2025, Venugopal Ramakrishnappa Reddy entered into an Acceptance, Waiver and Consent (“AWC”) with the Financial Industry Regulatory Authority (“FINRA”). The matter involved certain factual allegations by FINRA relating to participation in private securities transactions without providing prior notice to his firm. Importantly, Mr. Reddy neither admitted nor denied the factual allegations in the settlement.

As part of the resolution, FINRA imposed a \$5,000 civil monetary penalty (which would only be imposed if Mr. Reddy joined another FINRA member firm) and a six-month suspension from association with any FINRA member firm in any capacity. The matter has since been fully resolved, and Mr. Reddy has complied with all terms of the settlement.

We believe it is important that clients are aware of this prior regulatory matter. At the same time, it should be noted that the settlement did not involve any findings of fraud or dishonesty, and Mr. Reddy continues to maintain a strong commitment to serving clients with the highest level of professionalism and care.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither FBS Securities nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither FBS Securities nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Venugopal Ramakrishnappa Reddy is a licensed insurance agent with Frisco Business Solutions Group Inc. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of FBS Securities are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. FBS Securities addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. FBS Securities periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. FBS Securities will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by FBS Securities' supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Venugopal Ramakrishnappa Reddy is a Rotarian of a Rotary Club. It was founded in 1919, embodies "Service Above Self" through community service, youth programs, and mission projects. Rotarians are part of a global network of 1.2 million individuals dedicated to creating lasting change. He devotes 1 hour per month to business during trading hours as well as outside trading hours. He receives no yearly compensation from the business.

FBS Securities employs non-Series 65 licensed individuals in execution roles under the direct supervision of licensed IARs. These individuals do not provide advisory services, exercise discretion, or communicate investment recommendations to clients. Their duties are limited to trade implementation and operations within the scope of pre-approved instructions.

**Private Fund Management and Affiliated Entities** Venugopal Reddy, the principal of FBS Securities, is the sole member of Venu Reddy GP Holdings LLC, a personal holding company. Through this holding company, Mr. Reddy is a Managing Member and partial owner of Veridia MedTherapy Sponsor LLC (and affiliated Veridia entities), which acts as the General Partner, Manager, and/or Sponsor for private investment vehicles and special purpose vehicles (SPVs).

**Conflict of Interest & Mitigation:** This outside business activity presents a material conflict of interest. Because Mr. Reddy has a financial incentive (via his ownership stake, management control, and potential carried interest/promoted interest in Veridia MedTherapy Sponsor LLC) to recommend that advisory clients of FBS Securities invest in these affiliated private offerings, a conflict exists. To mitigate this conflict, FBS Securities acts strictly as a fiduciary. Clients of FBS Securities are never obligated to invest in any Veridia-sponsored SPVs. Furthermore, to eliminate "double-dipping" on advisory fees, FBS Securities will exclude the value of any client assets invested in

Veridia-sponsored vehicles from the client's total billable Assets Under Management (AUM) for the duration of the investment.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

FBS Securities may engage in the selection of third-party money managers but does not have any such arrangements in place at this time. Before selecting other advisers for clients, FBS Securities will always ensure those other advisers are properly licensed or registered as an investment adviser.

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

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

FBS Securities has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FBS Securities' Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

FBS Securities does not recommend that clients buy or sell any security in which FBS Securities, or a related person has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of FBS Securities may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FBS Securities to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FBS Securities will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of FBS Securities may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FBS Securities to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, FBS Securities will never engage in trading that operates to the client's disadvantage if representatives of FBS Securities buy or sell securities at or around the same time as clients.

## Item 12: Brokerage Practices

### A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on FBS Securities' duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and FBS Securities may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in FBS Securities' research efforts. FBS Securities will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

FBS Securities will require clients to use Charles Schwab & Co., Inc. Advisor Services, Interactive Brokers (CRD# 36418), Altruist Financial LLC (CRD# 299274) and/or Coinbase, Inc. (for digital asset accounts)..

#### *1. Research and Other Soft-Dollar Benefits*

FBS Securities receives no research, product, or services other than execution from broker-dealers or custodians in connection with client securities transactions ("soft dollar benefits").

#### *2. Brokerage for Client Referrals*

FBS Securities receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### *3. Clients Directing Which Broker/Dealer/Custodian to Use*

FBS Securities will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

### B. Aggregating (Block) Trading for Multiple Client Accounts

FBS Securities does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

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

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts are reviewed at least annually. Responsibility is assigned to the advisory team, including Venugopal Ramakrishnappa Reddy and other supervised personnel under his direction.

Accounts involving active trading, or elevated risk receive quarterly supervisory review. These reviews assess alignment with IPS, performance outcomes, and fee consistency. A review log is maintained internally.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Venugopal Ramakrishnappa Reddy, President. Financial planning clients are provided with a one-time financial plan concerning their financial situation.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, FBS Securities' services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of FBS Securities' advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

FBS Securities does not receive any economic benefit, directly or indirectly from any third party for advice rendered to FBS Securities clients.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

FBS Securities (FBS Securities) has entered into a relationship with UPTIQ, an unaffiliated internet-based lending platform providing a large network of lenders who can assist FBS Securities' clients with a variety of different types of personal and business loans (i.e., mortgage, home equity, auto, commercial, working capital, etc.). UPTIQ's platform seeks to match the client with those lenders who can best fulfill the client's borrowing needs. Once matched with a lender, UPTIQ's platform serves to help facilitate the loan application and fulfillment process. UPTIQ is compensated only by the lender.

Please Note: Conflict of Interest. UPTIQ offers to share a portion of its compensation with FBS Securities. Should the FBS Securities agree to accept such compensation, a conflict of interest is presented because the FBS Securities' prospective receipt of compensation provides the FBS Securities with an economic incentive to introduce the client to UPTIQ.

Please Also Note: No portion of any loan proceeds will be knowingly accepted by the FBS Securities for investment purposes.

No Obligation: No client is under any obligation whatsoever to utilize UPTIQ's services. There can be no assurance that the lending terms obtained via the UPTIQ platform will be more favorable than those available from non-platform lenders. The client remains free to consider/evaluate/utilize other lenders and platforms, and, to the extent reasonably requested, FBS Securities shall remain available to help assist the client with such evaluation process.

Recourse: It shall remain the client's exclusive obligation to repay the loan. The lender shall have recourse against the client in the event that the client fails to meet repayment obligations, including, depending upon the type of loan, recourse to the client's personal or business property, or investment accounts.

Licensing/Registration: Neither UPTIQ, nor FBS Securities, serves as a lender. Neither UPTIQ, nor FBS Securities, is registered or licensed as a lender or lending broker with any state or federal regulatory agency or authority. FBS Securities does not provide any services on behalf of UPTIQ.

Acknowledgment: In the event that a client desires to utilize the UPTIQ platform, the client will receive a separate Acknowledgement from the FBS Securities for review and execution.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, FBS Securities will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, FBS Securities will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- (C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from FBS Securities.

## **Item 16: Investment Discretion**

FBS Securities provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, FBS Securities generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. Where FBS Securities does not have discretionary authority to place trade orders, FBS Securities will secure client permission prior to effecting securities transactions for the client's account.

FBS Securities will also have discretionary authority to determine the broker dealer to be used for a purchase or sale of securities for a client's account.

## **Item 17: Voting Client Securities (Proxy Voting)**

FBS Securities will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

FBS Securities neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

## **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither FBS Securities nor its management has any financial condition that is likely to reasonably impair FBS Securities' ability to meet contractual commitments to clients.

## **C. Bankruptcy Petitions in Previous Ten Years**

FBS Securities has not been the subject of a bankruptcy petition in the last ten years.

# **Item 19: Requirements For State Registered Advisers**

## **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

The education and business backgrounds of FBS Securities' current management person, Venugopal Ramakrishnappa Reddy, can be found on the Form ADV Part 2B brochure supplements for those individuals.

The Chief Compliance Officer (CCO) of FBS Securities is Venugopal Ramakrishnappa Reddy. The CCO oversees compliance reviews, trade supervision, procedures, and documentation. Delegated authority is assigned for trade review and execution supervision when necessary. A succession memo and compliance SOP have been developed to ensure continuity and accountability.

## **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

## **C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

FBS Securities does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **D. Material Disciplinary Disclosures for Management Persons of this Firm**

One of our management persons has been involved in a disciplinary event that must be disclosed under this Item. Please refer to Item 9 (Disciplinary Information) above for more details.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither FBS Securities, nor its management persons, has any relationship or arrangement with issuers of securities.