

FORM CRS

June 2020

ITEM 1: Introduction

ITEM 2: What investment services and advice can you provide me?

CONVERSATION STARTERS: Ask your financial professional...

“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?”

ITEM 3: What fees will I pay?

CONVERSATION STARTERS: Ask your financial professional...

“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?”

Davis Capital Management (DCM) is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences between them. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

We offer investment advisory services to retail investors. DCM primarily provides wealth management services to high-net-worth individuals and families, and investment management services for trusts, estates, pension, 401(k) and profit-sharing plans, nonprofit organizations, and other legal entities. In addition, DCM offers fee-only financial planning services. Where requested, some advisors of DCM accept appointments in their individual capacity as trustee, executor, and/or power of attorney.

We offer a wide range of wealth management services to our clients who own separately managed accounts. We work with each client to establish an appropriate investment policy statement (IPS) based on the client's objectives, unique circumstances, time horizon, and risk tolerance. We generally invest client assets in domestic and international stocks, bonds, and exchange traded funds (“ETFs”). If you utilize our investment management services on a discretionary basis, you will give us discretionary authority to trade the assets in your account through a limited power of attorney contained in your client agreement with us. We will monitor the holdings and performance of the investments we make for you on an ongoing basis and from time-to-time provide you with reports about the performance and holdings of your account. We also offer financial planning services on a fee-only basis. If you utilize our fee-only financial planning services, we will not monitor the holdings and performance of your investments on an ongoing basis. Unless otherwise agreed, DCM's minimum entry asset size for separate account management is \$250,000.

For additional information, please refer to our **ADV Part 2A** brochure, especially **ITEM 4** (services), **ITEM 7** (types of clients), **ITEM 10** (financial affiliates), **ITEM 13** (account monitoring) and **ITEM 16** (discretionary authority).

<https://reports.adviserinfo.sec.gov/reports/ADV/149014/PDF/149014.pdf>

For our wealth and investment management services, we charge a fee that is based on a percentage of the value of the assets in your managed portfolio account. The more assets that are in your account and the higher the value of those assets, the more you will pay in fees. For standalone financial planning or consulting services, we charge fixed fees.

In addition to our fees, clients are responsible for fees, expenses and charges imposed by third parties in connection with the investment and maintenance of their assets. These fees, expenses and charges could potentially include brokerage commissions or securities transaction fees and other expenses and charges imposed by the client's custodian and/or broker-dealer, or custodial fees.

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.

For additional information, please refer to **ITEM 5** of Form **ADV**.

<https://reports.adviserinfo.sec.gov/reports/ADV/149014/PDF/149014.pdf>

ITEM 3: What fees will I pay? continued...

What are your legal obligations to me when acting as my investment adviser?

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

CONVERSATION STARTERS:
Ask your financial professional...

“How might your conflicts of interest affect me, and how will you address them?”

How do your financial professionals make money?

<https://reports.adviserinfo.sec.gov/reports/ADV/149014/PDF/149014.pdf>

ITEM 4: Do you or your financial professionals have legal or disciplinary history?

CONVERSATION STARTERS:
Ask your financial professional...

“As a financial professional, do you have any disciplinary history? For what type of conduct?”

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. 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. Here are some examples to help you understand what this means:

- We receive benefits from custodians that hold client assets. Some of these benefits assist us with managing and administering client accounts, while other benefits help us to manage and grow our business. Our receipt of economic benefits from custodians creates a potential conflict of interest since these benefits have the potential to influence the Firm’s recommendation of custodians who provide benefits over another that does not furnish similar benefits. As a fiduciary investment advisor, DCM is obligated to act in the best interests of its clients and to place its clients’ interests before its own. Although the decision as to where to custody their assets is ultimately made by clients, DCM will only recommend to its clients that they custody their assets at a financial services firm that DCM believes is in the best interests of its clients.
- Our advisory personnel’s service as trustee, executor or pursuant to power of attorney which gives them the authority to retain DCM to render investment advisory service presents a potential conflict of interest. However, we accept such appointments only upon the request of our clients. Additionally, when our firm’s advisors have the authority to appoint DCM as investment adviser, the trust or other relevant governing document authorizes the retention of our firm.

For additional information about our conflicts and how we address them, please refer to **ITEM 4** and **ITEM 12** of our **Form ADV** brochure.

<https://reports.adviserinfo.sec.gov/reports/ADV/149014/PDF/149014.pdf>

Our Firm’s financial professionals are compensated through salary and bonus or a share of the Firm’s profits. A portion of that compensation is correlated to the amount of client assets they service, the revenue our Firm earns from the financial professional’s services and/or whether the financial professional has been successful in increasing amount of client assets under the Firm’s management. For additional information, please refer to Item 5 of your financial professional’s ADV Part 2B Brochure Supplement. Compensation of our Firm’s financial professionals is unrelated to the type of product client assets are invested in.

<https://reports.adviserinfo.sec.gov/reports/ADV/149014/PDF/149014.pdf>

No, in order to work at DCM an advisor may not have any legal or disciplinary history. You can go to www.investor.gov/crs for a free and simple search tool to research our firm and our firm’s financial professionals.

DAVIS CAPITAL MANAGEMENT

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