

**Part 2A of Form ADV: *Firm Brochure***

**DARCY BRIX INVESTMENT ADVISOR REPRESENTATIVE, INC.  
DBA DARCY BRIX**

4420 Sherwin Road, Hamilton Hall  
Willoughby, Ohio 44094

Telephone: (440) 343-5353  
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Dated: 1/04/2024

**This brochure provides information about the qualifications and business practices of Darcy Brix Investment Advisor Representative, Inc. and doing business as Darcy Brix (hereinafter “firm” or “we”). If you have any questions about the contents of this brochure, please contact us at (440) 856-0320 or at [DarcyBrix@gmail.com](mailto:DarcyBrix@gmail.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. Registration does not imply a certain level of skill or training.**

**Additional information about Darcy Brix Investment Advisor Representative, Inc. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Darcy Brix Investment Advisor Representative, Inc. and DBA Darcy Brix is 166783. Registration with state regulatory authorities does not imply any level of skill or training.**

**Item 2. Summary of Material Changes**

We do not have any material changes to report.

This Item 2 is used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

To obtain our firm brochure and brochure supplements (information regarding each of our financial advisors), our Code of Ethics, or our Privacy Policy, please e-mail us at [darcybrix@gmail.com](mailto:darcybrix@gmail.com), telephone us at 440-343 5353 or mail your request to the address below.

**Company Name: Darcy Brix Investment Advisor Representative, Inc.  
DBA Darcy Brix  
Attn: Martin H. Snyder**

**Main Office Address: 4420 Sherwin Road  
Hamilton Hall  
Willoughby, Ohio 44094**

**Main Phone: 440-343-5353  
Fax Number: 440-856-0312**

**Item 3. Table of Contents**

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

#### **Item 4. Advisory Business**

Darcy Brix Investment Advisor Representative, Inc. and doing business as Darcy Brix, is a fee-based investment adviser registered with the state of Ohio, with its principal place of business located in Willoughby, Ohio. Our company was formed in October of 2011. Listed below are the firm's principal owners (i.e. those individuals and/or entities controlling 25% or more of this company.)

- Martin Snyder is the Chief Executive Officer, Chief Compliance Officer and 30% shareholder
- William Kubicek is the Chief Marketing Officer and 30% shareholder
- Michael Snyder is the Chief Information Officer and 30% shareholder
- Gretchen Kubicek is the Chief Financial Officer and 10% shareholder

Darcy Brix Investment Advisor Representative, Inc. and DBA Darcy Brix offers the following advisory services to clients:

#### **ADVISER REFERRAL SERVICES**

Our firm acts as a solicitor on behalf of various registered investment advisers (hereinafter, "RIA"), which are independent registered investment advisers unaffiliated with us. As a solicitor, our firm provides access to the advisory services of the various registered investment advisers transferring 401k plans and retirement plans to new custodians and assisting clients manage their retirement assets. Our services are limited to assisting the client in understanding the advisory services provided by the RIA. The RIA, not our firm, will act as investment adviser to the client's registered investment advisory account(s). Darcy Brix specializes in referring employment recruiters and their clients to registered investment advisers who offer these services. Therefore, clients will execute a separate advisory agreement with the unaffiliated RIA. Our firm will not monitor or review the clients' unaffiliated RIA accounts.

We do not represent that the third-party advisers and/or programs will provide the highest performance or the lowest cost in providing such services. We make no representation, express or implied, as to the quality of the services to be provided by any third-party adviser to any particular client. A client may be able to obtain the advisory services of the RIA without our referral and pay the RIA advisory fees higher or lower than those available to them through our referral.

We do not make any specific investment recommendations to clients, and our investment recommendations are, by definition, limited to the investment options available through and employed by the unaffiliated RIA.

We do not manage client accounts and do not have any assets under management.

## **Item 5. Fees and Compensation**

### **ADVISER REFERRAL SERVICES FEES**

We do not charge clients any fees for referrals to the unaffiliated RIAs for which we have provided a referral to the client. Fees for such referrals are paid to us by the unaffiliated RIA as a percentage of the management fees the RIA receives from the client. Client advisory fees are not increased in any way as a result of our firm's referral to the RIA. We will typically receive up to 25% of the advisory management fee paid by the client to the RIA. Clients should refer to the RIA's disclosure documents for information regarding its fees, billing practices, minimum required investments and termination of advisory agreements. We will provide these disclosure documents to our clients at the time of making the referral to any unaffiliated RIA.

***Termination of Advisory Relationship:*** Since clients do not enter into an advisory agreement with our firm, they should refer to the RIA's disclosure documents for information regarding termination of their advisory agreements with the RIA. We will provide these disclosure documents to our clients at the time of making the referral to the RIA.

***Mutual Fund and ETF Fees and Expenses:*** All fees paid to us and the RIA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee.

A client could invest in a mutual fund or and ETF directly, without the services of the RIA. In that case, the client would not receive the services provided by the RIA which are designed, among other things, to assist the client in determining which mutual fund or funds or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by RIA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Brokerage and Custodial Fees:*** In addition to advisory fees paid to the RIA, clients will also be responsible for all transaction, brokerage and custodial fees incurred as part of their account management with the RIA.

## **Item 6. Performance-Based Fees and Side-By-Side Management**

We do not charge any fees based on a share of capital gains or capital appreciation of the assets of a client. As stated previously, we do not manage client accounts.

## **Item 7. Types of Clients**

Our firm primarily provides advisory referral services to individuals and small companies. In addition to individuals we also occasionally provide advisory referral services to trusts and qualified retirement plans.

We generally do not have stated minimums and we do not manage client assets or accounts. However, the RIA may impose minimums as part of its advisory relationship with our clients. Therefore, clients should refer to the unaffiliated RIA's disclosure documents for more detailed information regarding minimum required investments and/or minimum fees. We will provide these disclosure documents to our clients at the time of making the referral to the RIA.

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

Third-Party Manager Analysis: We do not analyze the services of any RIA for which we have provided a referral; we simply act as a solicitor for these services.

A risk of investing with a third-party manager who has been successful in the past is that it may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we cannot adequately assess the presence of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Clients should refer to the RIA's disclosure documents for details regarding the types of investments, methods of analysis, sources of information, and investment strategies utilized. We will provide these disclosure documents to our clients at the time of making the referral to the RIA.

*Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.*

#### **Item 9. Disciplinary Information**

Our firm has no reportable disciplinary events to disclose.

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

In addition to advisory referral services described in Item 4 of this Brochure, the management of Darcy Brix is also separately employed as management of Main Sequence Technology. In this separate capacity as a management of Main Sequence Technology, they will receive separate, yet typical compensation. Main Sequence Technology develops software and database solutions for unaffiliated third party clients dealing with personnel recruitment.

Our firm acts as a referral source to the various registered investment advisers and does not recommend advisory products to clients. Clients are under no obligation in any way to engage Mr. Snyder or other members of his firm when considering implementation of any advice recommended by any RIA for which we provided a referral.

As previously disclosed, our firm acts as solicitor to various RIAs. As such, we receive a referral fee from the RIA for making client referrals to them. This arrangement presents a conflict of interest. Please refer to Item 14 of this Brochure for a more detailed explanation of this conflict of interest and the policies we have implemented to monitor and mitigate it.

Since we endeavor at all times to put the interest of our clients first, as part of our fiduciary duty as a registered investment adviser, we take the following steps to address this conflict:

1. We disclose to clients the existence of all material conflicts of interest;
2. We disclose to clients that they are not obligated to hire RIA to manage their assets;
3. We do not pay or collect referral fees from any *related* persons or entities;
4. We collect, maintain and document accurate, complete and relevant client background information;
5. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

We have no knowledge of the investment recommendations to be made to a client who hires any RIA for which we provided a referral.

We have established the following restrictions in order to ensure that our fiduciary responsibilities are met:

1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No principal or employee of our firm may prefer his or her own interest to that of the advisory client.
2. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
3. Any individual not in observance of the above may be subject to disciplinary action or termination.

#### **Item 12. Brokerage Practices**

As we do not manage client accounts, we have no brokerage arrangements (and therefore, no soft-dollar arrangements) and do not assist clients in establishing brokerage arrangements.

Clients should review their chosen RIA's disclosure documents for a detailed description of its brokerage practices, including best execution and trade aggregation and allocation policies and procedures. We will provide these disclosure documents to our clients at the time of making the referral to the RIA. Our firm does not review or evaluate the RIAs used therefore, cannot and does not represent that the RIA will achieve best execution on a trade-by-trade basis.

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

We do not review client accounts. Clients are urged to carefully review the chosen RIA's disclosure documents for a detailed description of account review practices by the firm. We will provide these disclosure documents to our clients at the time of making the referral to the RIA.

We do not provide any reports to clients. Clients should carefully review the RIA's disclosure documents for a detailed description of its reporting practices. We will provide these disclosure documents to our clients at the time of making the referral to the RIA.

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

As stated before, our firm acts as a solicitor for various RIAs, and for doing so, receives an ongoing referral/solicitation fee for referring clients to the various RIAs. This fee constitutes a portion of the advisory fee paid by the client to the RIA, is collected by the RIA, and remitted to us. However, the total program fee paid to the RIA by clients is not increased by the amount of our referral fee. This arrangement creates a conflict of interest to the extent that we are only paid if the client elects to utilize the RIA. We do not make referrals without being paid referral fees. We address this conflict of interest in the following ways:

1. We clearly disclose the existence of solicitation arrangements to existing and prospective clients in our disclosure documents, where applicable, so that our clients can assess the inherent conflicts of interest and make a fully informed investment decision;
2. We provide, where applicable, the following written disclosures to prospective clients prior to the execution of an advisory agreement with the third-party investment adviser or another financial institution:
  - a. The name of the third-party investment adviser;
  - b. The nature of the relationship, including any affiliation, between us and the investment adviser;
  - c. A statement that we will be compensated for our solicitation services by the investment adviser; and
  - d. The terms of such compensation arrangement, including a description of the compensation paid or to be paid to us.
3. We observe all rules promulgated under Section 206(4)-3 of the Investment Advisers Act of 1940 and/or similar state laws and regulations, where applicable.



**Item 15. Custody**

Our firm does not have actual or constructive custody of client assets. We urge all of our clients to carefully review and compare the reviews of account holdings and/or performance results they receive from the RIA to those they receive from their custodian. Any discrepancies should be reported to the RIA immediately.

**Item 16. Investment Discretion**

As we do not manage client accounts, we neither request nor accept investment discretion for client accounts. Clients should refer to their RIA's disclosure brochure document for information on the discretionary authority the firm may require. We will provide these disclosure documents to our clients at the time of making the referral to the RIA.

**Item 17. Voting Client Securities**

As a matter of firm policy, we do not vote proxies on behalf of clients. Clients should review their chosen RIA's disclosure documents to determine if the RIA votes proxies for clients, as well as their policies and procedures with regard to the voting of proxies.

**Item 18. Financial Information**

Under no circumstances will we earn fees in excess of \$500 more than six months in advance of advisory services rendered.

Our firm has not been the subject of a bankruptcy petition.

**Item 19. Requirements for State-Registered Advisers**

As mentioned in Item 10 of this Brochure, our firm's executive management, Martin Snyder, CEO and CCO; William Kubicek, CMO are also separately employed as mirrored executive management of Main Sequence Technology. In their separate capacities, they will receive separate, yet typical compensation from recruiters and third parties for the development of software and databases dealing with personnel recruitment. Our firm acts as a referral source to various registered investment advisers and does not recommend advisory products to clients. Clients are under no obligation in any way to engage Mr. Snyder or management of his firm when considering implementation of technology services or recruitment.

Mr. Martin Snyder and Mr. Kubicek may spend up to 90% of their time on this non-advisory activity. The education and business backgrounds of our principal executive officer can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

Our firm is also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Darcy Brix Investment Advisor Representative, Inc. has no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Darcy Brix and its management and personnel have not been the subject of a bankruptcy petition, legal or disciplinary event at any time.

### **Members' Education and Experience**

Martin H. Snyder (CEO and CCO of Darcy Brix Investment Advisor Representative, Inc.)

Born 06/23/1967

Graduated from Mayfield High School in 1998

Employed as Chief Executive Officer with Darcy Brix Investment Advisor Representative, Inc. - 2011 - Present

Employed as Chief Executive Officer with Main Sequence Technology - 1998 - Present

William Kubicek (CMO of Darcy Brix Investment Advisor Representative, Inc.)

Born 03/11/1970

BS in Environmental Engineering Technology from the University of Dayton - 1993

Employed as Chief Marketing Officer with Darcy Brix Investment Advisor Representative, Inc. - 2011 - Present

Employed as Chief Marketing Officer with Main Sequence Technology - 2011 - Present

Michael Snyder

Born 11/21/1969

BS in Mechanical Engineering from Rensselaer Polytechnic Institute - 1993

Graduated from Mayfield High School in 1998

Employed as Chief Information Officer with Darcy Brix Investment Advisor Representative, Inc. - 2011 - Present

Employed as Chief Information Officer with Main Sequence Technology - 2011 - Present

Gretchen Kubicek

Born 09/13/1971

Graduated from Beaumont High School in 1989

Employed as Chief Financial Officer with Darcy Brix Investment Advisor Representative, Inc. - 2011 - Present

Employed as Chief Financial Officer with Main Sequence Technology - 2011 - Present

**Part 2B of Form ADV: *Brochure Supplement***

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**DARCY BRIX INVESTMENT ADVISOR REPRESENTATIVE, INC.  
DBA DARCY BRIX**

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03/01/2018

**This brochure supplement provides information about Martin Snyder that supplements the Darcy Brix Investment Advisor Representative, Inc. and DBA Darcy Brix brochure. You should have received a copy of that brochure. Please contact Martin Snyder if you did not receive our brochure or if you have any questions about the contents of this supplement. Additional information about Martin Snyder is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The firm's CRD number is 166783 and Martin Snyder's individual CRD # is 6123658.**

## **Item 2. Educational Background and Business Experience**

Martin H. Snyder

Year of Birth: 1967

Education:

Martin Snyder graduated from Graduated from Mayfield High School in 1998.  
Attended University of Akron, 1986-1990, studied Finance/Marketing.

Business Background:

Employed as Chief Executive Officer with Darcy Brix Investment Advisor Representative, Inc. - 2011 - Present  
Employed as Chief Executive Officer with Main Sequence Technology - 1998 - Present

## **Item 3. Disciplinary Information**

Mr. Snyder does not have any history of disciplinary events.

## **Item 4. Other Business Activities**

Martin Snyder is also separately employed as the CEO of Main Sequence Technology, noted in Item 2 above. In his separate capacity as the CEO, he will receive separate, yet typical compensation. Our firm acts as a referral source to various registered investment advisers and does not recommend advisory products to clients. Clients are under no obligation in any way to engage Mr. Snyder or his firm when considering implementation of any technology services.

Mr. Snyder may spend up to 90% of his time on this non-advisory activity.

## **Item 5. Additional Compensation**

Our firm directly and Mr. Snyder, indirectly and as part of his overall compensation, receives referral fees in connection with referring clients to registered investment advisers. Payment of referral fees for prospective client referrals creates a potential conflict of interest to the extent that such a referral is not unbiased and the solicitor is, at least partially, motivated by financial gain. Therefore, such a referral may be made even if advisory services provided by these financial institutions are not suitable to a particular client's needs or entering into an advisory relationship with them is not, overall, in the best interest of the client. Our firm has developed policies and procedures to monitor and mitigate these conflicts of interest. A summary of our policies can be found in Item 14 of our firm's Form ADV Part 2A.

**Item 6. Supervision**

As the CEO of Darcy Brix, Martin Snyder is responsible for all employee supervision and the general direction and business strategy of the firm. He can be reached at (440) 856-0320.

**Item 7. Requirements for State-Registered Advisers**

Mr. Snyder does not have any history of disciplinary events or any financial conditions which would require disclosure.

**Part 2B of Form ADV: *Brochure Supplement***

William F. Kubicek  
791 Onaha Street  
Honolulu, HI 96816

Telephone: (440) 364-7500

**DARCY BRIX INVESTMENT ADVISOR REPRESENTATIVE, INC.  
DBA DARCY BRIX**

4420 Sherwin Road, Hamilton Hall  
Willoughby, Ohio 44094

03/01/2018

**This brochure supplement provides information about William Kubicek that supplements the Darcy Brix Investment Advisor Representative, Inc. and DBA Darcy Brix brochure. You should have received a copy of that brochure. Please contact Martin Snyder if you did not receive our brochure or if you have any questions about the contents of this supplement. Additional information about William Kubicek is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The firm's CRD number is 166783 and William Kubicek's individual CRD # is 6123248.**

## **Item 2. Educational Background and Business Experience**

William F. Kubicek

Year of Birth: 1970

Education:

William Kubicek graduated from University of Dayton with a BS in Environmental Engineering Technology in 1993.

Business Background:

Employed as Chief Marketing Officer with Darcy Brix Investment Advisor Representative, Inc. - 2012 - Present  
Employed as Chief Marketing Officer with Main Sequence Technology - 1998 - Present

## **Item 3. Disciplinary Information**

Mr. Kubicek does not have any history of disciplinary events.

## **Item 4. Other Business Activities**

William Kubicek is also separately employed as the CMO of Main Sequence Technology, noted in Item 2 Above. In his separate capacity as the CMO, he will receive separate, yet typical compensation. Our firm acts as a referral source to various registered investment advisers and does not recommend advisory products to clients. Clients are under no obligation in any way to engage Mr. Kubicek or his firm when considering implementation of any technology services.

Mr. Kubicek may spend up to 90% of his time on this non-advisory activity.

## **Item 5. Additional Compensation**

Our firm directly and Mr. Kubicek, indirectly and as part of his overall compensation, receives referral fees in connection with referring clients to registered investment advisers. Payment of referral fees for prospective client referrals creates a potential conflict of interest to the extent that such a referral is not unbiased and the solicitor is, at least partially, motivated by financial gain. Therefore, such a referral may be made even if advisory services provided by these financial institutions are not suitable to a particular client's needs or entering into an advisory relationship with them is not, overall, in the best interest of the client. Our firm has developed policies and procedures to monitor and mitigate these conflicts of interest. A summary of our policies can be found in Item 14 of our firm's Form ADV Part 2A.

**Item 6. Supervision**

As the CEO of Darcy Brix, Martin Snyder is responsible for all employee supervision and the general direction and business strategy of the firm. He can be reached at (440) 343-5353.

**Item 7. Requirements for State-Registered Advisers**

Mr. Kubicek does not have any history of disciplinary events or any financial conditions which would require disclosure.