

**I. Introduction**

Argent Capital Management LLC is registered with the Securities and Exchange Commission as an investment advisor, and we provide investment advisory services rather than brokerage services. Fees for investment advisory services and brokerage services differ, and it is important for the retail investor to understand the differences. This document gives you a summary of the types of services that we provide and how you pay for them.

Please ask us for more information. Free and simple tools are available to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisors, and investing.

**II. Relationships and Services****What investment services and advice can you provide me?**

*Services Offered:* We provide investment advisory services directly to institutional investors, investment advisors, trusts, charitable organizations and high net worth individuals, specializing in U.S. equities. We also are retained to manage investment models and client accounts, either as a sub-advisor or on a dual-contract basis, by a variety of third parties who are unaffiliated with us. Our firm engages in no business activities other than fee-based investment advisory services.

*Monitoring:* We offer you advice on a regular basis as a part of our standard services. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will contact you when we become aware of a significant change in the market or to your individual circumstances.

*Investment Authority:* We buy and sell investments in your account in accordance with your stated investment guidelines without asking you in advance. This is called “discretionary authority.”

*Limited Investment Offerings:* Argent’s primary activity is advising on publicly-traded equity securities. In addition, we may provide advice with respect to a client’s investments in other securities such as fixed income, mutual funds, exchange-traded funds, and cash investments.

*Account Minimums:* Our stated minimum client relationship size is \$500,000. This is negotiable at our discretion.

*Additional Information:* Our firm has been registered with the SEC since September 1998. We are a Missouri limited liability company that is 100% owned by current employees, of which Steven L. Finerty is principal owner.

*Ask us for our Form ADV Part 2A Disclosure Brochure for complete details about our services and fees.*

**Conversation Starter – 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?

**III. Fees, Costs, Conflicts, and Standards of Conduct****What fees will I pay?**

*Principal Fees and Costs:* You will pay an on-going, asset-based fee at the beginning of each quarter for our services as agreed in your contract, based on the value of the cash and investments in your advisory account. The more assets in your account, the more you will pay in fees, and the firm may therefore have an incentive to encourage you to increase the assets in your account. Our standard fee is a tiered schedule starting at 1% of assets per year. We may negotiate lower fee arrangements with clients at our sole discretion.

*Other Fees and Costs:* You are responsible for all custodial and securities broker-dealer execution fees charged by the custodian and executing broker-dealer. Our asset-based fee is separate and distinct from the custodian and brokerage fees. Some investments (such as mutual funds) may impose additional fees that will reduce the value of your investment over time. Clients who hire our services on a dual-contract basis will pay additional management

fees directly to the third-party with whom the client has also contracted. These fees are separate and distinct from our fees.

*Additional Information:* 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 more detailed information about our fees refer to the Fees and Compensation section (page 8) of our Form ADV Part 2A Disclosure Brochure***

**Conversation Starter – 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?

**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?”**

***Standard 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 you. Here are some examples to help you understand what this means.***

*Potential Conflicts:* Argent receives research services that are proprietary to broker/dealers effecting transactions, and third party research and brokerage services provided by broker/dealers through “soft dollars.” We receive a benefit because we do not have to produce or pay for the services. We may use research and brokerage services furnished by broker/dealers to service any or all of our clients, including accounts other than those that pay commissions to the broker/dealer providing the services. We may allocate brokerage for research and brokerage services that are also available for cash, where appropriate and permitted by law and may pay cash for certain research services received from external sources.

**Conversation Starter – 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?**

Our financial professional’s compensation structure consists of three components: a base salary, a discretionary bonus and for employees with equity ownership in the firm, partnership distributions. Compensation is commensurate with productivity. Bonuses are discretionary, and reflect the overall success of the firm and the individual. Our financial professionals may receive additional fees for referring clients.

**IV. Disciplinary History**

**Do you or your financial professionals have legal or disciplinary history?**

No. We have no legal or disciplinary history to report. Free and simple search tools are available to retail investors by visiting [www.Investor.gov/CRS](http://www.Investor.gov/CRS) to research our firm and financial professionals.

**Conversation Starter – Ask your financial professional:**

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

**V. Additional Information**

For additional information about our services, or for a copy of this disclosure, please contact:

Laurie Hayek, Chief Compliance Officer

Phone: 314-561-3549

Mark Caplinger, Chief Operating Officer

Phone: 314-561-4544

**Conversation Starter – Ask your financial professional:**

- 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?