

VILLAGE OF PALM SPRINGS GENERAL EMPLOYEES' PENSION FUND

Meeting of Tuesday, May 5, 2026

QUARTERLY MEETING NOTICE AND AGENDA

Location: Village of Palm Springs Council Chambers
226 Cypress Lane
Palm Springs, FL 33461
Meeting Contact: (800) 206-0116 (Plan Administrator)

Time: 2:00 P.M.

1. Call Meeting to Order
2. Public Comments
3. Minutes of Meeting Held February 3, 2026
4. Investment Monitor Report: Mariner Institutional (Jennifer Gainfort)
 - a. Quarterly Performance Report
 - b. GHA Firm Update dated February 17, 2026
5. Actuary Report: GRS (Shelly Jones)
 - a. Engagement Letter for 2025 Experience Review
6. Attorney Report: KKJL (Bonni Jensen)
 - a. Memorandum Regarding ADA Web Content Compliance dated April 1, 2026
 - b. Memorandum Regarding 2026 Online Form 1 Filing dated April 2026
7. Administrative Report – Resource Centers (Margie Adcock)
 - a. Benefit Approvals
 - b. Disbursements
 - c. Status of Village Appointed Trustee Position
 - d. Status of Transition in Payment of Benefits
8. Other Business
9. Schedule Next Quarterly Meeting: Tuesday, August 4, 2026 at 2:00 P.M.
10. Adjournment

PLEASE NOTE:

Should any interested party seek to appeal any decision made by the Board with respect to any matter considered at such meeting or hearing, he will need a record of the proceedings, and for such purpose he may need to insure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based. In accordance with the Americans With Disabilities Act of 1990, persons needing a special accommodation to participate in this meeting should contact The Resource Centers, LLC no later than four days prior to the meeting.

GARCIA HAMILTON & ASSOCIATES
VILLAGE OF PALM SPRINGS GENERAL EMPLOYEES' PENSION FUND
(1-103474.2) psge
February 13, 2026

PORTFOLIO COMPOSITION

	<u>Market Value</u>	<u>Pct. Assets</u>
FIXED INCOME	8,342,206.16	99.3
CASH	56,830.24	0.7
Total	8,399,036.40	100.0

CHANGE IN PORTFOLIO

Portfolio Value on 12-31-25	8,215,802.39
Accrued Interest	48,094.38
Net Additions/Withdrawals	-34.09
Realized Gains/Losses	6,190.48
Unrealized Gains/Losses	99,500.42
Income Received	23,192.35
Change in Accrued Interest	<u>6,290.48</u>
Portfolio Value on 02-13-26	8,344,651.55
Accrued Interest	54,384.85

TIME WEIGHTED RETURN

	<u>Month To Date</u>	<u>Year To Date</u>
Gross of Fees	1.37	1.64
Net of Fees	1.37	1.64
Bloomberg US Int. Aggregate	0.88	1.07

We urge you to compare account statements that you receive from us with the account statements that you receive from your custodian.
 Past performance is no guarantee of future results.

**VILLAGE OF
PALM SPRINGS GENERAL EMPLOYEES' PENSION FUND**

DISBURSEMENTS

May 5, 2026

• KLAUSNER, KAUFMAN, JENSEN & LEVINSON (Bill for services through March 31, 2026)	\$ 1,900.14
• THE RESOURCE CENTERS, LLC (Bill for March and April 2026)	\$ 3,200.00
• MARINER INSTITUTIONAL, LLC (Bill for Monitoring Fee for the 1st Quarter 2026)	\$ 6,178.19
• GARCIA HAMILTON (Bill for 1st Quarter 2026 Management Fee)	\$ 5,177.42
• COMERICA BANK (Bill for 4th Quarter 2025)	\$ 3,959.60
• GABRIEL ROEDER SMITH & COMPANY (Bill for actuarial services through March 31, 2026)	\$ 16,500.00
Total Disbursements for Approval	\$ 36,915.35

(Chair)

(Secretary)

Klausner, Kaufman, Jensen & Levinson

A Partnership of Professional Associations
Attorneys At Law
7080 N.W. 4th Street
Plantation, Florida 33317

Tel. (954) 916-1202
Fax (954) 916-1232

www.klausnerkaufman.com
Tax I.D.: 45-4083636

PALM SPRINGS GENERAL EMPLOYEES PENSION FUND
Attn: REBECCA MORSE AND MARGIE ADCOCK
226 CYPRESS LANE
PALM SPRINGS, FL 33461

March 31, 2026
Bill # 40248

CLIENT: PALM SPRINGS GENERAL : 150083
MATTER: PALM SPRINGS GENERAL : 150083

Professional Fees

Date	Attorney	Description	Hours	Amount
01/28/26	PARA	DRAFT NEW SPECIAL TAX NOTICE IN COMPLIANCE WITH IRS NOTICE 2026-13, SAFE HARBOR EXPLANATIONS.	0.50	0.00
02/02/26	BSJ	PREPARE FOR MEETING; REVIEW AGENDA AND MEETING BACKUP, INCLUDING MINUTES	0.50	0.00
02/03/26	BSJ	TRAVEL TO AND FROM MEETING	0.70	0.00
02/03/26	BSJ	ATTEND MEETING	1.50	0.00
02/03/26	PARA	PREPARATION OF MEETING MATERIALS.	1.00	0.00
02/06/26	BSJ	BEGIN REVIEW OF DROP DRAFT ORDINANCE	0.70	0.00
02/24/26	BSJ	REVIEW AND REVISE DROP ORDINANCE; REVIEW POLICE DROP	1.00	0.00
02/25/26	BSJ	EMAIL DRAFT DROP ORDINANCE WITH COMMENTS TO LARA DONLAN	0.20	0.00
03/03/26	BSJ	REVIEW EMAIL FROM LARA DONLON; ARRANGE TIME FOR DISCUSSION OF DROP	0.10	0.00
03/03/26	PARA	COMMUNICATION WITH LARA DONLON REGARDING AVAILABILITY FOR A CALL TO DISCUSS DROP.	0.20	0.00
03/05/26	BSJ	TELEPHONE CALL WITH LARA DONLAN REGARDING PROPOSED DROP	0.60	0.00
03/11/26	BSJ	RESEARCH AND REVIEW NOTICE 2026-13; REVIEW AND REVISE SPECIAL TAX NOTICE	0.50	0.00

Continued . . .

Professional Fees

Date	Attorney	Description	Hours	Amount
03/12/26	LG	DRAFT CLIENT MEMO RE ADA WEBSITE COMPLIANCE	0.10	0.00
03/20/26	BSJ	REVIEW AND RESPOND TO EMAIL FROM AUDITOR TO UPDATE THE AUDIT RESPONSE; REVIEW FILES	0.30	0.00
03/31/26	BSJ	RETAINER	0.00	1,900.14
		Total for Services	<u>7.90</u>	<u>\$1,900.14</u>

CURRENT BILL TOTAL AMOUNT DUE \$ 1,900.14



Resource Centers, LLC

4360 Northlake Blvd., Suite 206
Palm Beach Gardens, FL 33410

Invoice

Date	Invoice #
3/1/2026	22377

Bill To
Palm Springs General Employees' Pension Fund

Tax ID
Pension Resource Center 36-4504183 Resource Centers 87-0800468

Description	Qty	Rate	Amount
Palm Springs General Employees' Pension Monthly Administrator Fee for March 2026		1,500.00	1,500.00
Death Search - March 2026		100.00	100.00
Total Amount Due			\$1,600.00

Mail Payments to:
Resource Centers, LLC at Palm Beach Gardens address above.

If you have any questions concerning this invoice, please contact Michael Burr at Resource Centers, LLC
Phone 561.459.2985 or email - michael@resourcecenters.com



Resource Centers, LLC

4360 Northlake Blvd., Suite 206
Palm Beach Gardens, FL 33410

Invoice

Date	Invoice #
4/1/2026	22453

Bill To
Palm Springs General Employees' Pension Fund

Tax ID
Pension Resource Center 36-4504183 Resource Centers 87-0800468

Description	Qty	Rate	Amount
Palm Springs General Employees' Pension Monthly Administrator Fee for April 2026		1,500.00	1,500.00
Death Search - April 2026		100.00	100.00
Total Amount Due			\$1,600.00

Mail Payments to:
Resource Centers, LLC at Palm Beach Gardens address above.

If you have any questions concerning this invoice, please contact Michael Burr at Resource Centers, LLC
Phone 561.459.2985 or email - michael@resourcecenters.com

Mariner Institutional, LLC

531 W Morse Blvd Ste 200
Winter Park, FL 32789
+18444426326
institutionalAR@mariner.com

MARINER

INVOICE

BILL TO
Palm Springs General Employees Pension

INVOICE 80768
DATE 03/31/2026

DESCRIPTION	AMOUNT
Consulting Services and Performance Evaluation, Billed Quarterly (January, 2026)	2,059.40
Consulting Services and Performance Evaluation, Billed Quarterly (February, 2026)	2,059.40
Consulting Services and Performance Evaluation, Billed Quarterly (March, 2026)	2,059.39

It is our honor and privilege to provide excellent service. If this is not your experience, please contact us immediately.

BALANCE DUE

\$6,178.19

GH&A

GARCIA HAMILTON & ASSOCIATES, L.P.

INVOICE # 42757

5 HOUSTON CENTER
1401 MCKINNEY, SUITE 1600
HOUSTON, TX 77010
TEL: (713) 853-2322
FAX: (713) 853-2308

April 1, 2026

WWW.GARCIAHAMILTONASSOCIATES.COM

**VILLAGE OF PALM SPRINGS GENERAL EMPLOYEES' PENSION
FUND**

(1-103474.2) psge
Margaret M. Adcock
4360 Northlake Blvd., Suite 206
Palm Beach Gardens, FL 33410

GARCIA HAMILTON & ASSOCIATES
STATEMENT OF MANAGEMENT FEES

For The Period January 1, 2026 through March 31, 2026
Portfolio Valuation with Accrued Interest as of 03-31-26 8,283,877.13

8,283,877 @ 0.2500 % per annum 5,177.42
Quarterly Management Fee 5,177.42

TOTAL DUE AND PAYABLE 5,177.42



Attn: Trust Fee Accounting Group
 P.O. Box 75000, MC 3407
 Detroit, MI 48275

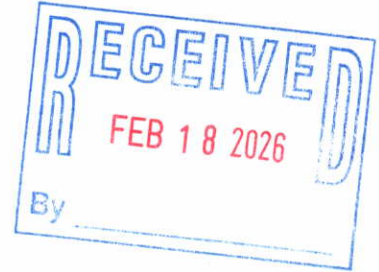
INSTITUTIONAL TRUST

Billing Period: 09/30/2025-12/31/2025
Due Date: 02/22/2026
Invoice No: 00022LP4S000
Relationship: VOPSGEN
Administrator: FELECIA RYANS
Phone: 313-222-9814

00000915 MGPCMAIN013126014844 00000 01 000000000 0001085 002



VOPSGEN
 EMPLOYEES PENSION FUND
 PENSION RESOURCE CENTER LLC
 ATTN: MARGARET ADCOCK
 PALM BEACH GARDENS FL 33410



The following is a statement of transactions pertaining to your account(s). For further information, please review the enclosed detail.

Opening Balance	7,512.21
Payment received through December 31, 2025	3,661.45
Current Period Charges	3,959.60
Balance Due	7,810.36

Please detach and return this portion of the statement with your check payable as indicated below.



Comerica Bank
 P.O. Box 670600
 Detroit, MI 48267-0600

Relationship
 VOPSGEN
Invoice No.
 00022LP4S000
Due Date
 02/22/2026
Total Balance Due
 \$7,810.36

00000915 04542 0001-0004 MGPCMAIN013126014844 01 L 0001085 0000 00000000

Billing Period: 09/30/2025-12/31/2025
Due Date: 02/22/2026
Invoice No: 00022LP4S000
Relationship: VOPSGEN

	Scheduled Charges	Net Scheduled Charges	Fee
Base Fees			
BASE FEE 500	125.00		
1-103474.1 VOPSGEN MUTUAL FUNDS PUSD			125.00
BASE FEE 500	125.00		
1-103474.2 VOPSGEN GHA FIXED INCOME PUSD			125.00
Market Value Fees			
4BP ON BAL			
28,839,007 @ 0.000400 each annually x 1/4	2,883.90		
1-103474.1 VOPSGEN MUTUAL FUNDS PUSD			2,883.90
4BP ON BAL			
8,256,969 @ 0.000400 each annually x 1/4	825.70		
1-103474.2 VOPSGEN GHA FIXED INCOME PUSD			825.70
Total Services:			3,959.60

00000915 04543 0003-0004 MGPCMAIN013126014844 01 L 0001085 0000 00000000



Invoice

Date	Invoice
4/8/2026	500452

Bill To:

Please Remit To:

Village of Palm Springs General Employee's Pension Fund
 Pension Resource Center, LLC
 Attention: Ms. Margaret M. Adcock, Esq., Plan Administrator
 4360 Northlake Boulevard, Suite 206
 Palm Beach Gardens, Florida 33410

Dept. # 78009
 Gabriel, Roeder, Smith & Company
 PO Box 78000
 Detroit, Michigan 48278-0009

Federal Tax ID
38-1691268

Client 1922

Amount

Professional actuarial and consulting services rendered on behalf of the Village of Palm Springs General Employees' Pension Fund

RETAINER VALUATION SERVICES rendered during quarter ended March 31, 2026 including:

- Preparation and attendance at February 3rd Pension Board Meeting	1,500.00
- Completion and delivery of October 1, 2025 Actuarial Valuation Report (1/27)	8,000.00
- Preparation and delivery of Government Accounting Standards Board (GASB) Statement No. 67/68 Actuarial information (1/27)	3,000.00
- Required upload of 140 data items of Actuarial Information as of October 1, 2025 to State portal including electronic copy of Actuarial Valuation Report (3/26)	1,000.00
- Preparation and delivery of October 1, 2025 Chapter 112.664 Compliance Report including required electronic upload to State Portal (3/26)	3,000.00

SPECIAL CONSULTING SERVICES rendered during quarter ended March 31, 2026 including:

- Response to auditor questionnaire (1/27) - no charge

Amount Due

\$16,500



MEMORANDUM

To: Boards of Trustees

From: Klausner, Kaufman, Jensen & Levinson

Subject: Electronic Financial Disclosure Management System for Form 1 filing

Date: April 2026

As you know, Commission on Ethics (CE) Form 1 – Statement of Financial Interests (“Form 1”) will need to be filed via the [Electronic Financial Disclosure Management System \(EFDMS\)](#) by July 1, 2026. The online portal provides a direct filing with the Florida Commission on Ethics (“Commission”).

Instructions, FAQs, and tutorials are available from the dashboard within EFDMS. Additional assistance can be obtained Monday-Friday from 8:00 a.m. until 5:00 p.m. by contacting the Commission at (850) 488-7864. If you have any login issues, please contact your Primary Coordinator at your municipality or district, usually in the Clerk’s Office.

If you have a public records exemption on file at your county supervisor of elections for redaction of certain information under Florida's Public Records Law, you will need to file a public records exemption request with the Commission. Please be advised that pension fund trustees are NOT subject to the new expanded requirement for Mayors and Elected members of governing bodies of municipalities to file the Form 6.

Please contact us if you have any questions.



MEMORANDUM

To: Board of Trustees

From: Klausner, Kaufman, Jensen & Levinson

Subject: Rule on the Accessibility of Web Content and Mobile Apps

Date: April 1, 2026

Background/Requirements

On April 24, 2024, the Federal Register published the Department of Justice's final rule updating its regulations for Title II of the Americans with Disabilities Act (ADA). The final rule has specific requirements about how to ensure that web content and mobile applications (apps) are accessible to people with disabilities. Like the rest of Title II, the rule applies to all public entities (which includes any agencies or departments of public entities) as well as special purpose districts. This includes pension plans, as they are agencies of a public entity.

The rule requires that state and local governments, including agencies of state and local governments, make web content and mobile apps accessible. The rule sets a concrete standard. The final rule establishes the Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA, as the technical standard for state and local governments' web content and mobile apps.

The deadline for compliance with the Final Rule will depend on the population size of the public entity or agency in question. The rule provides that the total population is generally determined by reference to the population for a public entity or the population estimate

7080 NORTHWEST 4TH STREET, PLANTATION, FLORIDA 33317

PHONE: (954) 916-1202 – FAX: (954) 916-1232

www.klausnerkaufman.com

for a public entity of which an entity is an instrumentality as calculated by the United States Census Bureau. While pension plans are agencies of a local government, as opposed to an instrumentality of the local government, in an abundance of caution, our opinion is that the total population of the local government, is the operative standard.

For pension plans where the local government population is greater than 50,000 the compliance deadline is April 24, 2026.

For pension plans where the local government population is less than 50,000, the compliance deadline is April 26, 2027.

For special government districts, the compliance deadline is also April 26, 2027.

All public entities must ensure that their web content and mobile apps comply with Level A and Level AA success criteria and conformance requirements specified in WCAG 2.1, unless the public entity can demonstrate that compliance with these requirements “would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.” The public entity has the burden of proof that compliance would result in such alterations or burdens.

Additionally, even if the web content does not meet the WCAG 2.1 standards, the content can still be considered WCAG-compliant if a “conforming alternate version” of the content is provided. A “conforming alternate version” is a separate web page that meets the WCAG 2.1 Level AA criteria, contains the same information and functionality as the inaccessible web page, is as up to date as the non-conforming content, and is at least as accessible as the non-conforming content. A public entity may use a conforming alternate version only where it is not possible to make web content directly accessible due to “technical or legal limitations.”

The rule specifically applies to web content that a public entity provides or makes available, subject to the following exceptions:

1. Archived web content;
2. Preexisting conventional electronic documents;
3. Content posted by a third party;
4. Individualized conventional electronic documents that are password protected or otherwise secured; and
5. Preexisting social media posts.

There are over 80 different “success criteria” set forth in WCAG 2.1, available here: [Web Content Accessibility Guidelines \(WCAG\) 2.1](#). Based on the website, WCAG 2.1 “covers a wide range of recommendations for making Web content more accessible.” Here is a customizable quick reference that includes all the guidelines, success criteria, and techniques for authors to use as they are developing and evaluating Web Content: [How](#)

[to Meet WCAG \(Quickref Reference\)](#). Here are the techniques, which provide examples of ways to meet the WCAG 2.1 AA: [All WCAG 2.1 Techniques | WAI | W3C](#).

Recommendations

Pension plans where the local government population is greater than 50,000 will need to comply with this rule by April 24, 2026. If your local population is less than 50,000, you will have until April 2027 to comply with this rule.

This means that all documents and digital content that do not fit into one of the exceptions listed above will need to meet the WCAG 2.1 Level AA standard by the above noted dates.

For pension plans that maintain their own website, we are recommending that this memo be sent to vendors to alert them of this requirement so future reports and web content will meet the WCAG 2.1 Level AA Standard. If vendors or the pension plan do not have the software in place to meet that deadline, our recommendation is to not include any new documents (those approved by the Board after April 2026) on the Plan's website until such time as they are in compliance with the rule. Some pension plans may need to take down their websites entirely until they are in compliance with the rule.

The only information needed on the pension plan's website is the Public Records Custodian name and contact. Additionally, we are recommending that Boards work with their Plan Sponsor's IT Department, as well as the Plan Sponsor to come into compliance at the earliest possible opportunity. Either the Plan Sponsor will need to have software in place, or the vendors will need to provide the pension plan with a compliant format.

Additionally, for future engagement letters and contracts with vendors, our firm will seek contractual provisions that require the vendor to provide their reports in an ADA compliant format.

If a pension plan is presented with an ADA claim regarding this issue, please contact our office for assistance.



April 24, 2026

Board of Trustees
Village of Palm Springs General Employees' Pension Fund
c/o Ms. Margaret M. Adcock, Plan Administrator
Resource Centers, LLC
4360 Northlake Blvd, Suite 206
Palm Beach Gardens, FL 33410
<margie@resourcecenters.com>

**Re: Village of Palm Springs General Employees' Pension Fund
Engagement Letter – 2025 Experience Review**

Dear Trustees:

Gabriel, Roeder, Smith & Company (GRS) is pleased to present our engagement letter to perform an experience review for the Village of Palm Springs General Employees' Pension Fund (the Plan).

Purpose

For a defined benefit pension plan, the true cost of the Plan is only known after the last benefit has been paid. In order to have assets on hand to pay member benefits as they become due, an actuarial valuation of the Plan is performed to determine annual employer contributions. This actuarial valuation is based on use of a model which estimates the Plan's liability using various inputs including Plan provisions, a "snapshot" of census and financial information as of the valuation date, various assumptions regarding the future, and methods (such as the period used to amortize unfunded accrued liability). The items necessary to perform the actuarial valuation that will be included in our review are described below in the section entitled "Scope."

In simple terms, an "experience review" is performed to compare actual past experience to the outcome that was assumed in the actuarial valuation. The review of past experience, in conjunction with expectations of the future, allows us to make recommendations which we understand will produce a better estimate of the Plan's actual liability and improve the actuarial soundness of the Plan.

It is considered best practice by the Government Finance Officers Association (GFOA), the Society of Actuaries (SOA), and the Conference of Consulting Actuaries (CCA) to conduct an experience review at least once every five years.

We are not aware of a prior experience review for the Plan.

Scope

GRS will review Plan experience for the five-year period ended September 30, 2025, where credible, to make recommendations on the actuarial assumptions and methods used in future annual actuarial valuations.

The following assumptions have been identified for analysis. Those stated below are as in the October 1, 2025 actuarial valuation of the Plan.

1. Investment Return Assumption – The current net assumed investment return assumption is 6.0% per year (including 2.0% inflation).
2. Salary Increase Rates – The current salary increase assumption varies by age (including 2.0% inflation). Accrued benefits are increased 1% at retirement and termination to account for accumulated leave payouts.
3. Termination Rates – The current assumed termination rates vary by age and service.
4. Retirement Rates – The current retirement assumption varies by age and service.
5. Amortization Period – Any new unfunded accrued liability at the valuation date is amortized as a level dollar amount using the net assumed investment return over 5 years.
6. Mortality Rates – The assumed mortality rates are as prescribed by Chapter 112.63, Florida Statutes. Our review of this assumption will be to demonstrate whether it appears reasonable.

Proposed Fees

We propose a flat fee of \$9,000 for the experience review. The results of our work will be presented in person at a quarterly Board meeting.



Information Requirements

Please confirm the most recent Investment Policy Statement (IPS) is that signed August 1, 2023.

Please provide information regarding unused vacation time paid at retirement and termination if you would like this assumption to be reviewed.

Timing

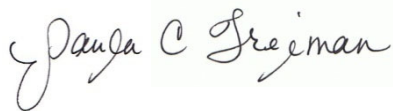
We anticipate our experience review will be completed to present at the November 2026 Board meeting, depending on the Board's direction to proceed with this work and receipt of the information requirements.

Other Considerations

Upon approval by the Board of Trustees of any changes in actuarial assumptions, we expect the updated assumptions will be first used in the October 1, 2026 actuarial valuation.

We look forward to performing this important work on behalf of the Plan. If you should have any question concerning the above, please do not hesitate to contact us.

Sincerest regards,
Gabriel, Roeder, Smith & Company



Paula C Freiman, ASA, EA, FCA
Enrolled Actuary No. 23-5796
Consultant & Actuary



Shelly L Jones, ASA, EA, CFA
Enrolled Actuary No. 23-8646
Consultant & Actuary

Margie Adcock

From: Connie Davis <cdavis@garciahiltonassociates.com>
Sent: Tuesday, February 17, 2026 4:28 PM
To: Margie Adcock; gready@vpsboards.com
Cc: Yvette Duenas
Subject: [EXT] GHA-Village of Palm Springs GE Pension 2026 Update
Attachments: psge performance update.pdf

Good afternoon,

It has certainly been a busy and exciting 2026 for us. As we shared in our recent quarterly newsletters (GHA Gazette), after 26 wonderful years with the firm, our partner Stephanie Roberts will be retiring at the end of this quarter. We are grateful for her many contributions and wish her all the best! Effective January 1st, the firm repurchased her ownership and redistributed it to an existing partner, who has been with the firm for 15 years, and two new partners, one who has been with the firm for 12 years and another who joined us three years ago.

As you know, the portfolio recorded strong absolute and relative performance in 2025, and it is continuing in 2026. Presently as of February 13th, the Bloomberg Intermediate Aggregate benchmark return is 1.07%, and your portfolio's return is 1.64% gross of fees, already outperforming by 57 bps YTD (see attached). We are happy to schedule a call, or an in-person visit if you would like to review the portfolio in more detail. Please feel free to reach out to set up a time or to share any questions or concerns.

Thank you again for your continued trust and partnership. We look forward to connecting with you soon.

Warm regards,
Connie

Gilbert Andrew Garcia is a former official guest contributor for CNBC. See the link below for some of his segments: <https://qrco.de/GGarciaCNBC>

Connie Davis

Partner, Investment Analyst

1401 McKinney Street, Suite 1600 | Houston, TX 77010

P: 713-853-2306

cdavis@garciahiltonassociates.com

[Email](#) | [Map](#) | GarciaHamiltonAssociates.com



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Garcia Hamilton and Associates, L.P. (GH&A) is 100% employee-owned and MWBE/MBE/HUB certified in several states. Go to www.garciahamiltonassociates.com for more information.

Garcia Hamilton & Associates is proud to be named Fixed Income Investment Grade Manager of the Year (2014), and Fixed Income Intermediate-Term Manager of the Year (2015, 2016) by Institutional Investor. Awards/rankings may not represent client experiences and are not indicative of future performance. Go to www.garciahamiltonassociates.com/awards/ for additional information on each award. The firm is 100% employee-owned and is certified as a MBE.

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

GH&A

GARCIA HAMILTON & ASSOCIATES, L.P.

5 HOUSTON CENTER
1401 MCKINNEY, SUITE 1600
HOUSTON, TX 77010-4035
TEL: (713) 853-2322
FAX: (713) 853-2300
WWW.GARCIAHAMILTONASSOCIATES.COM

April 2, 2026

Please find the following annual disclosures provided.

- Annual Privacy Disclosure:

As required by the Gramm-Leach-Bliley Act (GLBA), Garcia Hamilton & Associates, L.P. (GH&A) has developed a privacy notice to be delivered annually to relevant clients. This notice has been formatted and written to be clear and conspicuous and discloses the Firm's information and sharing practices along with other required information. GH&A has determined that it will deliver its annual privacy notice no later than June 30th of each year.

Please read the attached notice and contact Charlotte Cates Castro at compliance@garciahiltonassociates.com, (713) 853-2320, if you have any questions or concerns about what we are doing to protect your privacy.

- Annual Form ADV Amendment:

We have completed the annual amendment of the Firm's Form ADV. Copies of the first two pages of Form ADV 2A containing a summary of material changes are attached for your records.

Please contact Charlotte Cates Castro at compliance@garciahiltonassociates.com, (713) 853-2320, if you have any questions or would like a complete copy of our Form ADV disclosure.

Thank you,



Charlotte Cates Castro, Certified Compliance & Ethics Professional (CCEP)®
Partner, Chief Compliance Officer, Director of HR

Collection of Client Information

GH&A collects only relevant information about our clients in order to conduct our business and properly service our accounts or that may be required by law. The types of personal information we may collect can include non-public information such as social security number, address, telephone number, email address, IP address, assets, income, investment objective, and information regarding your interaction with our website or applications.

We collect financial and other personal information about our clients from the following sources:

- Investment management contracts and other forms submitted to us by our clients;
- Forms or other correspondence from parties authorized to act on behalf of our clients such as accountants, attorneys, and investment consultants; and
- Our website or other applications. To read our complete online Privacy Policy, please visit: <https://garciahiltonassociates.com/privacy-policy/>.

Keeping Information Secure

We maintain physical, electronic and procedural safeguards and procedures to protect your financial and other personal information, and we continuously strive to improve these safeguards and procedures.

Limiting Access to Information

All of our employees are aware of the importance of maintaining and respecting customer privacy and recognize the importance of confidentiality. In addition, all employees are required to sign a Confidentiality & Non-disclosure Agreement as a condition of employment. Employees who violate our privacy policies are subject to disciplinary action.

Accuracy of Information

We strive to keep accurate client information records, and we take immediate steps to correct errors as they are found. If there are any inaccuracies in your account statements or in any other communications from us, please contact us immediately, and we will make the necessary corrections.

Use of Personal and Financial Information by Us and Third Parties

We share information about our clients with non-affiliated third parties only to the extent necessary for us to provide the services for which our clients have hired us, and then only to the extent permitted by law:

- We share information with brokers and custodian banks in order to process securities transactions accurately;
- We may share information with non-affiliated third parties in order for the third party to carry out its services for us; and
- We may share information as allowed by law in connection with a subpoena or similar legal process, an audit, or a government or self-regulatory organization request or investigation.

We do not sell your personal information or engage in joint marketing arrangements with non-affiliated third parties that involve the sharing of non-public information regarding GH&A clients. We also do not sell client information to non-affiliated third parties for their own marketing purposes. We may use the information we collect about you for our own direct marketing purposes. You may, at any time, request that we cease to use your information for our own direct marketing purposes by emailing us at compliance@garciahiltonassociates.com.

Any exceptions to these practices are made only with the permission of the particular client for the sharing of information with identified third parties or as otherwise required by law. If a client terminates our services, we will continue to adhere to the privacy policies and procedures as described in this notice.

Maintaining Customer Privacy in Business Relationships

We do not share client information with anyone who does not agree to keep such information confidential and only then in situations where the Client expressly agrees in writing. If you believe we have shared your information inappropriately, please contact the Chief Compliance Officer, compliance@garciahiltonassociates.com or 713-853-2322 and corrective steps will be taken.

January 31, 2026

GH&A

GARCIA HAMILTON & ASSOCIATES, L.P.

ADV Part 2A – Firm Brochure

Item 1: Cover Page

Garcia Hamilton & Associates, L.P.

Five Houston Center
1401 McKinney Street, Suite 1600
Houston, Texas 77010

Telephone: 713.853.2322 / Fax: 713.853.2300
Email: Charlotte.Castro@GarciaHamiltonAssociates.com
Web Address: www.GarciaHamiltonAssociates.com

March 31, 2026

This brochure provides information about the qualifications and business practices of Garcia Hamilton & Associates, L.P. If you have any questions about the contents of this brochure, please contact us at 713.853.2322 and/or Charlotte.Castro@GarciaHamiltonAssociates.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.

Additional information about Garcia Hamilton & Associates, L.P. also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Firm's CRD number is 108017.

Garcia Hamilton & Associates, L.P., is a registered investment adviser. Registration as an Investment Adviser does not imply a certain level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Item 2: Material Changes

A. Annual Update

On July 28, 2010, the United State Securities and Exchange Commission [SEC] published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure, as of December 31, 2025, is an updated document prepared according to the SEC’s requirements and rules.

B. Material Changes since the Last Annual Amendment, Dated: March 31, 2025

This section of the Brochure will address only those “material changes” that have been incorporated since our last annual updating amendment posted on the SEC’s public disclosure website (IAPD) www.adviserinfo.sec.gov on March 31, 2025.

The following material changes were made since our last annual amendment of ADV Part 2A:

- Item 5: Fees & Compensation: Separate Account Portfolio Management Fees: The Firm amended the fee for the following SMA strategies: Short Duration Government Strategy, Short Duration Government/Credit Strategy, and the Short Duration Opportunistic Strategy.

We may, at any time, update this Brochure and either send you a copy or offer to send you a copy when accompanied by a Statement of Material Changes (either email or in hard copy form).

C. Full Brochure Available

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to SEC Rules, we will ensure that you receive either an updated Brochure or a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We will further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.