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DEPUTY SECURITIES COMMISSIONER

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## Texas State Securities Board

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IN THE MATTER OF THE INVESTMENT  
ADVISER REGISTRATION OF P&P  
WEALTH MANAGEMENT LLC AND  
THE INVESTMENT ADVISER  
REPRESENTATIVE REGISTRATION  
OF TYRE POST

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**Order No. IC-26-SUS-02**

TO: Tyre Post, CCO (CRD No. 4937178)  
P&P Wealth Management LLC (CRD No. 158469)  
505 Salem Rd.  
Victoria, TX 77904

### DISCIPLINARY ORDER

Be it remembered that P&P Wealth Management LLC (“Respondent P&P”) and Tyre Post (“Respondent Post”) (collectively, “Respondents”) appeared before the Securities Commissioner of the State of Texas (“Securities Commissioner”) and consented to the entry of this order (“Order”), the Findings of Fact, Conclusions of Law, and Undertaking contained herein.

### FINDINGS OF FACT

1. Respondents have waived (a) Respondents’ right to notice and hearing in this matter; (b) Respondents’ right to appear and present evidence in this matter; (c) Respondents’ right to appeal this Order; and (d) all other procedural rights granted to the Respondents by The Securities Act, Tex. Gov’t Code §§ 4001.001-4008.105 (“Texas Securities Act”), and the Administrative Procedure Act, Tex. Gov’t Code Ann. §§ 2001.001-2001.903.
2. On September 1, 2011, Respondent P&P registered as an investment adviser with the Securities Commissioner. Since September 1, 2011, Respondent P&P’s registration has expired nine (9) times. Respondent P&P most recently registered with the Securities Commissioner on February 2, 2024. This registration is currently effective.
3. On September 1, 2011, Respondent Post registered as an investment adviser representative with the Securities Commissioner. Since September 1, 2011, Respondent Post’s registration has expired eight (8) times. Respondent Post most

recently registered with the Securities Commissioner on February 2, 2024. This registration is currently effective.

4. Respondents currently have twenty (20) clients and about three million dollars (\$3,000,000.00) in assets under management.

#### Respondents' Unregistered Activity

5. As previously mentioned, on September 1, 2011, Respondent P&P and Respondent Post first registered as an investment adviser and investment adviser representative, respectively, with the Securities Commissioner.
6. And as previously mentioned, Respondent P&P's registration has expired nine (9) times and Respondent Post's registration has expired eight (8) times.
7. On December 31, 2013, Respondents failed to properly renew their registrations with the Securities Commissioner<sup>1</sup>. Respondent P&P paid the late renewal fee and renewed Respondent P&P's registration on January 14, 2014, thirteen (13) days late. Respondent Post paid the late renewal fee and renewed Respondent Post's registration on January 27, 2014, twenty-six (26) days late<sup>2</sup>.
8. On December 31, 2014, Respondents again failed to renew their registrations with the Securities Commissioner. Both Respondents paid the late renewal fee and renewed their registrations on April 1, 2015, ninety (90) days late.
9. On December 31, 2015, Respondents again failed to renew their registrations with the Securities Commissioner. Both Respondents paid the late renewal fee and renewed their registrations on April 15, 2016, one hundred five (105) days late.<sup>3</sup>
10. On December 31, 2016, Respondents again failed to renew their registrations with the Securities Commissioner. Both Respondents paid the late renewal fee and renewed their registrations on June 26, 2017, one hundred seventy-six (176) days late.
11. On December 31, 2017, Respondents again failed to renew their registrations with the Securities Commissioner. Both Respondents paid the late renewal fee and renewed their registrations on March 23, 2018, eighty-one (81) days late.

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<sup>1</sup> Pursuant to Section 4004.252(a) of the Texas Securities Act, a person may renew an unexpired registration by filing a renewal application in the form the Commissioner prescribes and by paying the required renewal fee to the board before the registration's expiration date.

<sup>2</sup> Pursuant to Section 4004.255 of the Texas Securities Act, subsection (a) states that a person whose registration has been expired for 90 days or less may renew the registration by: (1) filing a renewal application with the Commissioner; and (2) paying to the board: (A) the required renewal fee; and (B) a fee that is equal to one-half of the original registration application fee.

<sup>3</sup> Pursuant to Section 4004.255 of the Texas Securities Act, subsection (b) states that a person whose registration has been expired for more than 90 days but less than two years may renew the registration by: (1) filing a renewal application with the Commissioner; and (2) paying to the board: (A) all unpaid renewal fees; and (B) a fee that is equal to the original registration application fee.

12. On December 31, 2019, Respondents again failed to renew their registrations with the Securities Commissioner. Both Respondents paid the late renewal fee and renewed their registrations on March 13, 2020, seventy-two (72) days late.
13. On December 31, 2020, Respondents again failed to renew their registrations with the Securities Commissioner. Respondent P&P paid the late renewal fee and renewed Respondent P&P's registration on June 15, 2021, one hundred sixty-five (165) days late. Respondent Post paid the late renewal fee and renewed Respondent Post's registration on February 10, 2022, four hundred five (405) days late.
14. On December 31, 2021, Respondent P&P again failed to renew their registration with the Securities Commissioner. Respondent P&P paid the late renewal fee and renewed Respondent P&P's registration on February 10, 2022, forty (40) days late.
15. On December 31, 2023, Respondents again failed to renew their registrations with the Securities Commissioner. Both Respondents paid the late renewal fee and renewed their registrations on February 2, 2024, thirty-two (32) days late.
16. From December 31, 2013, through February 10, 2022, Respondent P&P was unregistered nine (9) different times for a total of seven hundred seventy-three (773) days.
17. From December 31, 2013, through February 10, 2022, Respondent Post was unregistered eight (8) different times for a total of nine hundred eighty-seven (987) days.
18. During the unregistered periods described above, Respondents rendered investment advisory services for compensation while neither Respondent was registered with the Securities Commissioner. Respondents conducted three hundred thirty-seven (337) transactions in Respondents' clients' accounts.

#### UNDERTAKING

1. Respondents undertake and agree to retain an independent outside consultant ("Compliance Consultant") that is not unacceptable to the staff of the Texas State Securities Board (the "Staff") within one hundred and fifty (150) days of the date this Order is entered by the Securities Commissioner.
2. Respondents further undertake and agree to submit, at least ten (10) days prior to retaining a Compliance Consultant, a letter to the Staff identifying: the Compliance Consultant, the Compliance Consultant's experience in the securities industry, and all pre-existing personal and business relationships between the Compliance Consultant and either of the Respondents.
3. Respondents further undertake and agree to require the Compliance Consultant to complete a review of Respondents' business activities ("Review") within one

hundred and eighty (180) days from the date this Order is entered by the Securities Commissioner.

4. Respondents further undertake and agree that the Review will examine Respondents' business activities to monitor for compliance with this Undertaking, Respondents' policies and procedures, and all applicable securities laws, and will include, at a minimum, a review of:
  - a. Respondents' compliance with §116.5 of the Board Rules requiring investment advisers to maintain records in accordance with the minimum record-keeping requirements of the state;
  - b. Respondents' compliance with maintaining record of client contracts;
  - c. Respondents' compliance with maintaining record of client suitability information; and
  - d. Respondents' compliance with §116.10 of the Board Rules requiring investment advisers to establish, maintain, and enforce a system to supervise the activities of its investment adviser representatives that is reasonably designed to achieve compliance with the Texas Securities Act, the Board Rules, and all applicable securities laws and regulations, and that supervisory systems must be written.
5. Respondents further undertake and agree to require the Compliance Consultant to deliver to Respondent P&P, within thirty (30) days of the Review, a report ("Report") describing the areas the Compliance Consultant reviewed and its findings and recommendations.
6. Respondents further undertake and agree to submit to Staff within thirty (30) days of receiving the Report: (1) the Report; (2) a statement identifying all corrective measures taken by Respondents in response to the Report; and (3) a statement identifying the reason(s) for not following any of the Compliance Consultant's recommendations.
7. Respondents further undertake and agree that the Review and Report procedure described in Items 3, 4, 5, and 6 of the Undertaking section of this Order will be conducted on a semi-annual basis to detect activity that may violate this Undertaking, Respondents' policies and procedures, or applicable securities laws for a period of two (2) years from the date that Respondents retain a Compliance Consultant.
8. Respondents further undertake and agree to report to Staff within ten (10) days upon receiving any written or oral complaints and report the initiation of any regulatory or civil actions within which Respondents' names appear or in which Respondents are otherwise involved.

## CONCLUSIONS OF LAW

1. From September 2011 through April 2026, Respondent P&P acted as an “investment adviser” in Texas as the term “investment adviser” is defined by Section 4001.059 of the Texas Securities Act.
2. From September 2011 through April 2026 Respondent P&P violated Section 4004.052 of the Texas Securities Act by rendering services as an investment adviser in Texas nine (9) different times when Respondent was not registered with the Securities Commissioner as an investment adviser.
3. Pursuant to Section 4007.105(a)(13)(A) of the Texas Securities Act, Respondent P&P’s aforementioned violations of Section 4004.052 of the Texas Securities Act constitute bases for the issuance of an Order reprimanding Respondent P&P.
4. From September 2011 through April 2026 Respondent Post acted as an “investment adviser representative” in Texas as the term “investment adviser representative” is defined by Section 4001.060 of the Texas Securities Act.
5. From September 2011 through April 2026 Respondent Post violated Section 4004.102 of the Texas Securities Act by rendering services as an investment adviser representative in Texas eight (8) different times when Respondent was not registered with the Securities Commissioner as an investment adviser representative.
6. Pursuant to Section 4007.105(a)(13)(A) of the Texas Securities Act, Respondent Post’s aforementioned violations of Section 4004.102 of the Texas Securities Act constitute the bases for the issuance of an Order reprimanding Respondent Post.
7. Pursuant to Section 4007.105(a)(13)(A) of the Texas Securities Act, the aforementioned violations of Section 4004.102 of the Texas Securities Act constitute the bases for the issuance of an Order suspending Respondent Post’s registration as an investment adviser representative with the Securities Commissioner.

## ORDER

1. It is therefore ORDERED that P&P Wealth Management LLC is hereby REPRIMANDED.
2. It is therefore ORDERED that Tyre Post is hereby REPRIMANDED.
3. It is further ORDERED that P&P Wealth Management LLC and Tyre Post COMPLY with the terms of the Undertaking contained herein.
4. It is further ORDERED that the registration of Tyre Post as an investment adviser representative is hereby SUSPENDED for a period of two (2) weeks.

SIGNED AND ENTERED BY THE DEPUTY SECURITIES COMMISSIONER this  
7th day of May, 2026.

*Cristi R. Ochoa*

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Cristi R. Ochoa  
Deputy Securities Commissioner

Respondent:




P&P Wealth Management LLC

By: Tyre Post

Managing Member & Chief  
Compliance Officer

Approved as to Form:



Elliott Wolf,  
Attorney  
Legal and Investigations Division



Nadda Rungruangphol,  
Attorney  
Legal and Investigations Division