

EB5 Select LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of EB5 Select LLC. If you have any questions about the contents of this brochure, please contact us at (877) 678-9400 or by email at: info@eb5select.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 EB5 Select LLC is also available on the SEC's website at www.adviserinfo.sec.gov. EB5 Select LLC's CRD number is: 169818.

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

EB5 Select LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

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Item 4: Advisory Business

Business Description

Our advisory firm is a registered investment adviser with the SEC. We provide financial planning services to high-net-worth individuals concerning various securities, including real estate funds and private placements. As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our client's interests first and must fully disclose any potential conflict of interest.

A. Description of the Advisory Firm

EB5 Select LLC (hereinafter "EB5") is a Limited Liability Company organized in the State of Florida.

The firm was formed in November 2013, and the principal owners are Jason M. Edwards and Garrett Kenny.

B. Types of Advisory Services

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Subadviser Services

EB5 may also act as a subadviser providing financial planning services to advisers that manage business development companies. These third-party advisers would outsource financial planning services to EB5. This relationship will be memorialized in each contract between EB5 and the third-party adviser.

Services Limited to Specific Types of Investments

EB5 generally limits its investment advice to real estate funds and private placements, although EB5 primarily recommends private placements to a majority of its clients. EB5 may recommend other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

EB5 offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client

Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. EB5 does not participate in any wrap fee programs.

E. Assets Under Management

EB5 has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	January 2014

Item 5: Fees and Compensation

A. Fee Schedule

Financial Planning Fees

Clients may terminate the agreement without penalty for a full refund of EB5's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Fixed Fees

The rate for creating client financial plans is between \$3,000 and \$12,000. These fees are not negotiable. The final fee schedule will be attached as Exhibit II of the Financial Planning Agreement.

B. Payment of Fees

Payment of Financial Planning Fees

Financial planning fees are paid via check and wire.

Fixed financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by EB5. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

EB5 collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither EB5 nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

EB5 does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

EB5 generally provides financial planning to the following types of clients:

- ❖ High-Net-Worth Individuals
- ❖ Other investment advisers
- ❖ Business development companies

Minimum Account Size

There is no account minimum for any of EB5's services.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

EB5's methods of analysis include fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investment Strategies

EB5 recommends long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Recommended

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Private Placements carry a substantial risk as they are subject to less regulation than publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Jason Edwards is a registered representative of Calton Associates.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither EB5 nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Jason Edwards is a registered representative and investment adviser representative of Calton Associates, as well as an insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay

a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. EB5 always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to purchase such services or products through any representative of EB5 in such individual's outside capacities.

Garret Joseph Kenny is an associated person a real estate broker or dealer. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. EB5 always acts in the best interest of the client and clients are in no way required to the services of any representative of EB5 in connection with such individual's activities outside of EB5.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

EB5 does not utilize nor select third-party investment advisers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

EB5 has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. EB5's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

EB5 does not recommend that clients buy or sell any security in which a related person to EB5 or EB5 has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of EB5 may buy or sell securities for themselves that they also recommend to clients. While EB5 does not manage client assets, this may provide an opportunity for representatives of EB5 to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives

profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. EB5 will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of EB5 may buy or sell securities for themselves at or around the same time as clients. While EB5 does not manage client assets, this may provide an opportunity for representatives of EB5 to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, EB5 will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

EB5 does not trade client's accounts.

1. Research and Other Soft-Dollar Benefits

EB5 does not trade client's accounts or recommend broker/custodians, and therefore receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

EB5 receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

EB5 does not trade client's accounts, and therefore does not require that client use any particular broker.

B. Aggregating (Block) Trading for Multiple Client Accounts

EB5 does not trade client's accounts or recommend broker/custodians, and therefore does not have the ability to block trade purchases across accounts.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jason M Edwards. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

With respect to financial plans, EB5's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

EB5 does not receive any economic benefit, directly or indirectly from any third party for advice rendered to EB5's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

EB5 does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

EB5 does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Item 16: Investment Discretion

EB5 does not have discretion over client accounts at any time.

Item 17: Voting Client Securities (Proxy Voting)

EB5 will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

EB5 neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither EB5 nor its management has any financial condition that is likely to reasonably impair EB5's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

EB5 has not been the subject of a bankruptcy petition in the last ten years.