

**Item 1      Cover Page**

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

for

Marshall G. Eichenauer, Jr.

**Sagent**|Wealth Management

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This brochure supplement provides information about Marshall G. Eichenauer, Jr. that supplements the Sagent Wealth Management Firm Brochure. You should have received a copy of that brochure. Please contact Sagent Wealth Management if you did not receive Sagent Wealth Management Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Marshall G. Eichenauer, Jr. is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

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

Name:        Marshall G. Eichenauer, Jr.

Age:         Born February 1961

Education: Arizona State University  
Bachelor of Finance  
1983

University of Pennsylvania-The Wharton School  
Certified Investment Management Analyst  
2005

Every Investment consultant who has earned the CIMA designation has at least three years of broad experience in the field of investment management consulting, has passed an extensive background check, and has completed the demanding graduate-level program of study. Level I of the CIMA program contains extensive self-study and examination. Candidates then proceed to Level II, held either online or in the classroom, with the faculty from the most prestigious business schools. Successful completion of a comprehensive final exam precedes certification. CIMA designees then must complete forty hours of continuing education every two years to maintain their licenses.

### **Professional Experience**

Sagent Wealth Management  
Owner and Investment Advisor  
August 2008 to Present

UBS Financial Services, Inc. (and its predecessors)  
Senior Vice President-Investments  
December 1996 to August 2008

Smith Barney (and its predecessors)  
Financial Advisor  
February 1993 to December 1996

### Item 3     **Disciplinary Information**

Sagent Wealth Management (SWM) and all Registered Investment Advisors are subject to inspections and examinations by the Office of Compliance Inspections and Examinations (OCIE) of the Securities and Exchange Commission. As described on their website, “OCIE serves as the “eyes and ears” of the SEC.” They, “conduct examinations of regulated entities to promote compliance, prevent fraud, identify risk and inform policy.”<sup>i</sup>

Most Registered Investment Advisors are periodically the subject of an inspection and examination by the OCIE. These inspections and examinations can be of a routine nature or they may be based on specific areas that OCIE is focusing on. The reason why a Registered Investment Advisory firm has been selected for an inspection and examination is non-public information and typically will not be shared by the OCIE.<sup>ii</sup>

In June of 2015, SWM was notified that it would be the subject of an inspection and examination by OCIE. Over the course of the next year, SWM met with OCIE and provided them copies of financial statements, trading files, legal documents, emails and other documents that they requested, pertaining to SWM, Sagent Capital (the owner of SWM), Sagent Private Investment Fund I (a private investment fund that was formed in 2010 and liquidated in 2016) and Sagent Fund Management (the Manager of the Sagent Private Investment Fund I).

After reviewing this material, the OCIE delivered to SWM a letter dated February 11, 2016 that addressed deficiencies and weaknesses for corrective action, that dealt predominantly with SWM’s operational policies and procedures. After receiving this letter, SWM addressed these matters with OCIE and took corrective action.

On August 15<sup>th</sup>, 2016, SWM received a second letter from the OCIE, that addressed deficiencies and weaknesses related to the Sagent Private Investment Fund I (SPIF). After receiving this letter, SWM proposed to OCIE corrective action to address the deficiencies and weaknesses identified in the August 15<sup>th</sup> 2016 letter. OCIE did not respond to SWM’s proposed corrective actions but instead notified SWM that they were considering bringing charges for violations of securities laws, against SWM and/or Marshall Eichenauer, Jr..

They indicated that these charges related to loans that were made by SPIF to SWM between March of 2012 and January of 2015, and focused on advance disclosure of conflicts of interest and investor approval requirements related to these conflicts of interest, which OCIE believed did not occur, in violation of securities laws.

On September 22, 2017, without admitting or denying the findings in the matter, Marshall Eichenauer, Jr. and Sagent Wealth Management agreed to settle SEC charges that they violated the Advisers Act's anti-fraud protections by failing to disclose Mr. Eichenauer's conflict of interest or obtain investor's consent in causing the Sagent Private Investment Fund to make loans to Sagent Wealth Management.

A complete copy of the Settlement will be made available upon request.

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

Mr. Eichenauer holds a Real Estate Brokers License with the California Bureau of Real Estate and Life-Only and Accident and Health licenses with the California Department of Insurance.

#### **Item 5      Additional Compensation**

It is anticipated that Mr. Eichenauer sole compensation will come from SWM however he may occasionally receive compensation directly from his real estate and life insurance activities.

#### **Item 5      Supervision**

As the Owner and Managing Partner of Sagent Wealth Management, there are no individuals that supervise Mr. Eichenauer's activities.

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<sup>i</sup> 2017-01-12 National Exam Program, Office of Compliance Inspections and Examinations, Examination Priorities for 2017

<sup>ii</sup> 2017-01-17 U.S. Compliance Consultants FAQs