
Stone Eagle Investments LLC

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Form ADV Part 2A – Firm Brochure

www.stoneeagleinvestments.com

Dated September 20, 2018

This Brochure provides information about the qualifications and business practices of Stone Eagle Investments LLC, “Stone Eagle”. If you have any questions about the contents of this Brochure, please contact us at 852 98425006. 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.

Stone Eagle Investments LLC is registered as an Investment Adviser with the States of Florida and Texas. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Stone Eagle is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 288578.

Item 2: Material Changes

Since the initial filing of this Form ADV Part 2A for Stone Eagle, dated January 19, 2018, the following material change has occurred:

- Item 1: Firm is seeking registration with Texas, approved, and Florida, pending.

In the future, any material changes during the year will be reported here.

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Item 4: Advisory Business

Description of Advisory Firm

Stone Eagle Investments LLC is registered as an Investment Adviser with the Securities and Exchange Commission. We were founded in April of 2017. Emily Harris is the principal owner of Stone Eagle and Edward J. Harris is the Chief Executive Officer and Chief Compliance Officer. As of September 11, 2018, Stone Eagle manages \$647,000.00 on a discretionary basis and \$0.00 on a non-discretionary basis.

United Kingdom Pension Services

We provide pension advice to UK expatriates or other nationals who have existing UK-based pension plans. Our services include a review of each client's existing UK pension assets. The review will include a summary of the particular retirement and death benefits available to the client under existing UK pension plan(s) and, where applicable, the recent investment performance of the pension assets. The review will also include, where appropriate, recommendations with regard to a potential transfer of such pension assets to a new pension provider and the selection of investment managers. The review process can also include an assessment of the client's individual risk tolerance. Our services also include notifying clients from time to time of significant changes in UK pension legislation that could impact their pension assets and providing ongoing advisory services, as requested.

Following receipt of a client authorization form, we will request a statement of benefit from the client's existing UK pension plan administrators or trustees. Once obtained, we will generally deliver to the client a written assessment of the client's UK pension assets based upon the statement of benefits received. Our advice extends to those pension plans available to UK expatriates for their existing UK pension assets. These can include a Self-Invested Personal Pension ("SIPP"), a Qualifying Recognized Overseas Pension Scheme ("QROPS"), and/or other applicable plans. By assisting with the transfer of pension assets from existing UK pension plans to a new plan, the firm aims to provide clients with greater control of their UK pension assets via a more flexible pension plan with wider investment-related options.

Pension plan statements and other reports are generally sent directly to clients on an annual basis (unless requested more frequently) by the selected pension trustee, the custodian of record, and/or others similarly involved with the client pension plan. Clients are encouraged to review such material carefully for a complete understanding of the services offered and the costs associated with the management of such pension plans. Questions regarding our firm, its services/fees and other associated issues may be addressed with firm personnel directly.

Investment Management Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular

circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background. We select unaffiliated investment advisers ("sub-advisers") to provide investment management services to our client.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Investment Management Services

The standard advisory fee is based on the market value of the account and is calculated as follows:

Account Value	Annual Advisory Fee	Outside Manager
\$1 - \$199,999	1.50%	0.25%
\$200,000 - \$499,999	1.25%	0.25%
\$500,000 - \$1,999,999	1.00%	0.25%
\$2,000,000 and Above	0.80%	0.25%

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The advisory fees are directly debited from client accounts, or the client may choose to pay by check. Please note, the above

fee schedule does include the Outside Manager's fee of 0.25%. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

United Kingdom Pension Service

Pension transfers from the United Kingdom will be assessed a flat fee upon commencement of the service, which will vary depending on the size of the transfer and the level of complexity involved but can range from £5,000 to £10,000. The fee will be taken direct from the transferred money and paid to us by the pension trustee. The annual management fee is also a flat fee and will be disbursed from the pension fund and paid to Stone Eagle. Both the trustee of the pension and the beneficiary of the pension will need to agree to the fees before fees are paid.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept 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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide advisory services to individuals, and high net-worth individuals. For accounts to be transferred, our minimum account size requirement is \$100,000.00. While this our Firm policy, we will consider other account sizes on a case by case basis.

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

Our analysis of a client's existing UK pension assets extends to the firm's knowledge of UK pension legislation, domestic and foreign markets, and a host of other guiding principles. Where clients existing pension assets are held in the UK, they are subject to UK pension legislation, save as provided for under the 2001 USA-UK Double Taxation Convention.

The primary investment strategy we employ is based on asset allocation as the core foundation in order to help further increase diversification and reduce risk. Stone Eagle will develop a diversified investment portfolio by blending various global asset classes and styles of exchange traded funds (ETF) and/or mutual funds (large cap, small cap, mid-cap, international, emerging markets, bonds, alternatives, growth, value) in varying proportions to determine the optimal mix based on the client's financial goals, risk preference, time horizon, and other relevant factors unique to the client's situation. The objective of this strategy is to create the greatest probability for accomplishing the client's financial goals over time while minimizing risk and volatility that can be associated with investing.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

Item 9: Disciplinary Information

Criminal or Civil Actions

Stone Eagle and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Stone Eagle and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Stone Eagle and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Stone Eagle or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No Stone Eagle employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Stone Eagle employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Edward J. Harris is the 100% shareholder and Director of Holborn Limited, a Hong Kong based licensed insurance broker. There are no business dealings between Stone Eagle and Holborn Limited. Mr. Harris does and will continue to receive revenue from investment options and insurance products sold and held in Hong Kong. While Mr. Harris is not licensed to sell insurance products in the United States, he will maintain his Hong Kong insurance license.

Recommendations or Selections of Other Investment Advisers

Stone Eagle employs other investment advisers to provide investment management services for the accounts of clients. In such circumstances, the other investment adviser will be compensated with an asset management fee. When employing another investment adviser, the client's best interest and suitability of the other investment advisers will be the main determining factors of Stone Eagle. The fees will be disclosed to the client in advance.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. Our policy is designed to assure that the personal securities transactions, activities and interests of the employees of our firm will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities prior to the same security for clients on the same day.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Stone Eagle Investments LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive 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

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients’ money over using a lower-cost custodian.

The Custodian and Brokers We Use

Stone Eagle does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We may recommend that our clients use

Aggregating (Block) Trading for Multiple Client Accounts

Outside Managers used by Stone Eagle may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. In the event Stone Eagle is executing a trade on behalf of a client, we do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts, and that trades conducted by Stone Eagle are typically in response to a specific client request, we do not believe clients are hindered in any way because we trade accounts individually.

Item 13: Review of Accounts

Clients with the UK Pension Service are subject to an initial review by Edward J. Harris, CEO and CCO. Subsequent reviews will be conducted prior to and upon clients reaching certain designated ages. More frequent review may be implemented where there has been a market downturn, where certain laws and regulations regarding pensions have changed and where clients have notified the firm of a change to their financial status or risk tolerance. Clients are strongly encouraged to notify the firm of any changes to their financial wellbeing, any change that may impact the status of their financial objectives, and/or any relocation back to the UK.

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Edward J. Harris, CEO and CCO. The account is reviewed with regards to the client’s investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Stone Eagle will provide written reports to Investment Management clients on a quarterly basis. We urge clients to compare these reports against the account statements they receive from their custodian.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Stone Eagle does not accept custody of client funds. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures,

Item 16: Investment Discretion

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500.00 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

Edward J. Harris

Born: 1975

Educational Background

- 1997 – BSc (Hons) Economics and Politics, University of Bristol, United Kingdom

Business Experience

- 04/2017 – Present, Stone Eagle Investments LLC, CEO and CCO
- 01/2018 – 06/2018 Holborn, Hong Kong, CEO
- 01/2012 – 12/2017 Globaleye, Hong Kong, CEO
- 05/2011 – 11/2011, deVere USA, Inc, Area Manager

Other Business Activities

Edward J. Harris is not involved with outside business activities.

Performance Based Fees

Stone Eagle is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Stone Eagle Investments LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have with Issuers of Securities

Stone Eagle Investments LLC, nor Edward J. Harris, have any relationship or arrangement with issuers of securities.