



NewEra Wealth Advisors
INDEPENDENCE MATTERS

NewEra Wealth Advisors, Inc.

CRD# 331612

Form ADV Part 2A – Disclosure Brochure

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This Brochure provides information about the qualifications and business practices of NewEra Wealth Advisors Inc. (“NewEra” or the “Adviser”). If you have any questions about the contents of this Brochure, please contact NewEra at telephone number (786) 577-9396 or by email at yelward@newerawealthadvisors.com

The information in this Brochure has not been approved or verified by any state or federal securities authority.

Registration of an investment adviser does not imply any level of skill or training. The oral and written communications received from an adviser provide you with information about which to utilize in determining to hire or retain an investment adviser.

Additional information about NewEra also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

NewEra may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you within 120 days of the close of NewEra's fiscal year, which is December 31 of each year.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Adviser's firm name. You may also request a copy of this Disclosure Brochure at any time, by contacting NewEra at 786-577-9396 or by email at info@newerawealthadvisors.com.

Additional information about NewEra is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with NewEra who are registered, or are required to be registered, as Investment Adviser Representatives ("IARs") of NewEra.

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Item 4 – Advisory Business

Firm Description

NewEra Wealth Advisors Inc. (“NewEra”) is a corporation duly organized under the laws of the State of Florida on April 15, 2024. NewEra’s members are Victor K. Hernandez (CRD No.5015535) and Yaniris Elward (CRD 7915498). This disclosure brochure provides information regarding the qualifications, business practices and the services provided by NewEra.

NewEra offers the following services to its clients:

Investment Advisory Services

Adviser provides discretionary and non-discretionary investment advisory services to its clients through various types of accounts in accordance with each client’s investment objectives. Investment activities focus on investments in various kinds of assets and securities in a variety of markets that is intended to fit within the client’s objectives, strategies and risk profile as described by each client.

NewEra offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. NewEra creates an Investment Policy Statement for each client, which outlines the client’s current investment profile (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client’s specific situation. Investment Policy Statement may include, but not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

NewEra evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. Accounts may focus on investments in specified and limited kinds of assets and securities, in limited markets, or they may be broad-based across many asset classes and markets. Such accounts are intended to fit within the investor’s objectives, strategies and risk profile as described by each client. The strategies utilized for these customized accounts may be similar to or may vary widely from the core strategies typically utilized by the Adviser, as further described in Item 8. Clients may place targets on these accounts and may restrict the types of investments made in such accounts.

As an investment adviser, NewEra provides portfolio management and administrative services to client accounts (the “Accounts”), including investigating, analyzing, structuring, and negotiating potential investments, monitoring the performance of investments and advising the Accounts as to the disposition of investment opportunities.

Adviser provides investment advisory services to Adviser’s clients through the management of investment portfolios in accordance with the objectives, guidelines, and risk profiles of individual clients. Clients provide such information to Adviser at or before the time they enter into an advisory agreement with Adviser.

NewEra offers several specialized programs, as follows:

Family Wealth Services

As an investment adviser, NewEra provides portfolio management and administrative services to our clients, including investigating, analyzing, structuring and negotiating potential investments, monitoring the performance of investments and advising the clients as to the disposition of investment opportunities.

Adviser provides investment advisory services to clients through the management of investment portfolios in accordance with the objectives, guidelines and risk profiles of the individual clients. Clients provide such information to Adviser at or before the time they enter into an advisory agreement with the Adviser. The Adviser may provide additional services to the clients. The scope of services and additional fees are negotiated individually with each client and incorporated into the Investment Advisory Agreement.

NewEra may also refer clients to other financial services companies, including commercial banks, as a courtesy to the client and with no compensation from the institution. NewEra does not assume any responsibilities for the products and services offered by said institutions. NewEra strongly recommends clients to perform their own due diligence on these institutions before opening a new account / relationship with them.

Selection of Other Advisors (Third Party Portfolio Managers or “TTPMS”)

Based upon the Investment Policy Statement defined for each client (as described above), the Adviser may recommend to certain clients that they authorize the active discretionary management of a portion of their assets by certain investment managers that are not affiliated with the Adviser. Adviser continues to render services to the client and, in addition, monitor and review the performance of the third-party manager and the performance of the client’s accounts that are being managed.

We may use the services of third-party investment advisors as sub-advisors. If we choose this option, we will select a third-party investment advisor whose style and talent best fit your

individual needs and objectives. Your agreement with us gives us the authority to hire or fire these managers on your behalf. Once a third-party investment advisor is selected, we will continue to monitor their performance. If our services to you include the use of these third-party investment advisors, you will typically sign an agreement with them in addition to the advisory agreement you will sign with NewEra. If you are interested in learning more about any of these third-party investment advisors and their services, a complete description of their programs, services, fees, payment structure and termination features are found in their service disclosure brochures, investment advisory contracts, and account opening documents. Our advisory responsibility is to select and monitor any third-party investment advisor that provides services to us.

Factors that we consider in their selection may include:

- Their size
- How long they have been in business
- The experience level and turnover of their portfolio managers
- A review of their historical performance and risk measurements
- A review of their disclosure documents In deciding to use a third-party investment adviser to manage your assets, we consider your risk tolerance, goals, objectives, time horizons, and general financial situation.

We also consider your level of investment experience and the assets you have available for investment. If you were to go to these third-party investment advisors on your own, the fees they charge you may be more or less than going through us. However, when using their services directly, you will not receive our expertise in developing an investment strategy, selecting the third-party investment advisors to use, monitoring the performance of your account, and changing third-party investment advisors if needed

Additional General Information

Other professionals (e.g., trust companies, lawyers, accountants, insurance agents, etc.) may be recommended to clients or engaged directly by the client on an as-needed basis. No compensation is received from such referrals. Conflicts of interest related to recommendations of other professionals will be disclosed to the client in the event they should occur. Additionally, NewEra's client agreements may not be assigned without client consent.

Investment Restrictions

Adviser offers an array of services and clients can select among the services that the client and the Adviser feel are suited for the client. Clients may impose reasonable restrictions on the management of their accounts, including by restricting particular securities or types of investments. Clients should be aware that the performance of restricted accounts may differ from performance of accounts without such impediments, possibly producing lower overall results.

NewEra does not charge any set-up fees.

Assets Under Management

As of September 30, 2024, NewEra has approximately \$7,861,046 in Assets Under Management, all discretionary.

Item 5 – Fees and Compensation

Adviser typically receives an annual management fee of 1% of the Gross Asset Value of the Account(s) designated by the client. Alternatively, clients may choose to pay a flat fee for advisory services, payable on a periodic basis. Fees are typically paid quarterly in advance; however, some agreements may exist with fees paid in arrears. Flat fees will be negotiated with each client individually, but in no case will such flat fee be greater than 1% of the Gross Asset Value of the designated Accounts.

Adviser may enter into flat fee arrangements from time to time, typically for administrative services provided to clients or client Accounts. Adviser may also provide sub-advisory and administrative services for a flat fee based upon actual cost, which is outlined and established via sub-advisory/administrative services agreement.

The specific manner in which fees are charged by Adviser is established in each client's written agreement with Adviser. Generally, and pursuant to contract, fees for the management of Accounts will be based upon a percentage of the total assets in the account (including margined assets).

Calculation and Deduction of Advisory Fees

Fees for investment advisory services and other non-discretionary programs are billed to clients, although frequently clients pre-authorize their custodians to automatically deduct the fees from the client's account and to make payment to Adviser. Management fees are deducted or billed, periodically (generally quarterly) , as specified in the advisory agreement, in advance.

A client may pay more or less fees than similar clients depending on the particular circumstances of the client, size, additional or differing levels of servicing or as otherwise agreed with specific clients. Clients that negotiate fees, including a flat fee, may end up paying a higher fee than that set forth above as a result of fluctuations in the client's assets under management and account performance.

In the event the NewEra bills fees in advance, refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter). Clients may terminate their

contracts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

Additional Fee Information

Clients may authorize the Adviser to directly debit management fees from client accounts on a periodic basis (generally on a quarterly basis). In such instances, management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. No prepaid fees are charged six months or more in advance.

Alternatively, in some instances, clients may receive an invoice for fees, in which it may choose to pay NewEra directly for its billed fees for the relevant period.

Adviser's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred directly by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds fees, and other fees and taxes on brokerage account and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. It is the Adviser's policy not to accept "kick-backs" or retrocession fees from any third non-affiliated party providing services to the Adviser's clients.

Estate Planning Services

If required, the adviser will conduct an initial estate planning assessment and refer the client to third party service providers, including lawyers and estate planning professionals, for the implementation of the plan. The Client may use any service provider for Estate Planning services.

Item 12 further describes the factors that Adviser considers in selecting or recommending broker-dealers for client transactions and custody and in determining the reasonableness of their compensation (i.e. commissions).

Termination of the Agreement

Although an Agreement between NewEra and its clients are ongoing agreements, the length of service to the client is at the client's discretion. The client may terminate the agreement with a (1) day advance notice to the adviser; the adviser may terminate an Agreement by written notice to the other party with (30) thirty days advance notice or as agreed upon otherwise between the client and the Adviser.

After the advisory contract is terminated by either party, the adviser will charge standard hourly consulting fees, at a rate of \$500.00 / hr., for the time used for processing additional requests from the former client.

NewEra does not charge any termination fees.

Item 6 - Performance-Based Fees and Side-by-Side Management

NewEra does not charge performance-based fees for its investment advisory services. The fees charged by NewEra are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Item 7 - Types of Clients

NewEra provides investment advisory services to individuals, high-net-worth and ultra-high-net-worth individuals, trusts, estates, corporations and business entities. NewEra generally requires a minimum relationship size of \$5,000,000, however, a lesser amount may be accepted at Adviser's sole discretion.

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

General Investment Strategies and Methods of Analysis

Adviser has arrangements with third party service providers through which Adviser receives general macroeconomic analyses of economies, currencies, markets and market sectors. Such third-party service providers also provide research reports on specific securities, sample asset allocations and administrative services. Adviser uses such information and services as a tool and Adviser also performs its own research and due diligence on advisers and investment opportunities. Adviser makes investment allocation decisions based on each client's investment objectives and risk tolerance, among other factors. The design and day-to-day management of client portfolios is determined by Adviser through the assigned portfolio manager. Third party service providers utilized by the Adviser do not have access to or knowledge of information concerning the specific investment decisions and recommendations made to Adviser's clients.

Adviser seeks asset preservation and capital appreciation of clients' portfolios by customizing asset allocations and selecting investment vehicles that it believes will align with each client's short and long-term investment needs and goals. The asset class allocations forecasts and expectations are analyzed and invested in various financial instruments, typically include equity, fixed income, options and alternative investments. Adviser will select and monitor the investment vehicles for each asset class in the portfolios based on their history and prospective risk and return characteristics, and determine suitability for each client's needs, as well as, estimated fees and expense.

Material Risks for Significant Investment Strategies

While it is the intention of Adviser to implement strategies, which are designed to minimize potential losses suffered by its client, there can be no assurance that such strategies will be successful. It is possible that a client may lose a substantial proportion or all of its assets in connection with investment decisions made by Adviser. The following is a discussion of typical risks for Adviser's clients, but it does not purport to be a complete explanation of the risks involved with Adviser's investment strategies.

There is no guarantee that in any time period, particularly in the short term, a client's portfolio will achieve appreciation in terms of capital growth or that a client's investment objective will be met by Adviser.

The value of the securities in which Adviser invests on behalf of its clients may be volatile. Price movements may result from factors affecting individual companies, sectors or industries that may influence certain strategies or the securities market as a whole. Furthermore, a client will be subject to the risk that inflation, economic recession, changes in the general level of interest rates or other market conditions over which Adviser will have no control may adversely affect investment results.

Adviser notes that while Adviser's management of accounts may not involve direct leveraging, or other risk factors discussed below, the underlying funds and other investments that comprise client accounts may engage in practices that can materially impact the performance of such fund or investment, which in turn may materially impact the value of Adviser's clients' portfolios.

Hedging transactions may increase risks of capital losses

Adviser may utilize hedging strategies primarily to protect and preserve capital as well as yield enhancement. Investment products in which Adviser invests clients' accounts may utilize a variety of financial instruments, such as options, for risk management purposes. While hedging transactions may seek to reduce risk, such transactions may result in a worse overall performance. Certain risks cannot be hedged, such as credit risk, relating both to particular securities and counterparties. Adviser will not always invest in funds or other investment vehicles that utilize hedging strategies.

Leverage

Adviser does not utilize leverage under its current strategies. NewEra, however, reserves the right to engage in leveraged strategies.

Liquidity of investment portfolio

The market for some securities in which Adviser invests indirectly on behalf of its clients may be relatively illiquid. Liquidity relates to the ability to sell an investment in a timely manner. The market for relatively illiquid securities tends to be more volatile than the market for more liquid securities.

Investments in relatively illiquid securities may restrict the ability of a fund or portfolio manager to dispose of investments at a price and time that it wishes to do so. The risk of illiquidity also arises in the case of over-the-counter transactions. There is no regulated market in such contracts and the bid and offer prices will be established solely by dealers in these contracts. Client accounts that are invested in funds or other instruments that contain illiquid investments may be subject to these risks.

Foreign currency markets

Adviser's investment strategies may cause a client to be exposed to fluctuations in currency exchange rates where it invests directly or indirectly in securities denominated in currencies other than U.S. dollars. Adviser may from time-to-time engage in direct foreign currency transactions. However, the underlying funds and other investment vehicles may engage in direct foreign currency trading. The markets in which foreign exchange transactions are effected are highly volatile, highly specialized and highly technical. Significant changes, including changes in liquidity and prices, can occur in such markets within very short periods of time, often within minutes. Foreign exchange trading risks include, but are not limited to, exchange rate risk, interest rate risk and potential interference by foreign governments through regulation of local exchange markets, foreign investment, or particular transactions in foreign currency.

Derivatives

Adviser's investment strategy may cause a client to be exposed to derivatives including instruments and contracts the value of which is linked to one or more underlying securities, financial benchmarks or indices. Derivatives allow an investor to hedge or speculate upon the price movements of a particular security, financial benchmark, index, currency or interest rate at a fraction of the cost of investing in the underlying asset. The value of a derivative depends largely upon price movements in the underlying asset. Therefore, many of the risks applicable to trading the underlying asset are also applicable to derivatives trading. However, there are a number of other risks associated with derivatives trading. For example, because many derivatives provide significantly more market exposure than the money paid or deposited when the transaction is entered into, a relatively small adverse market movement can result not only in the loss of the entire investment but may also expose a client to the possibility of a loss exceeding the original amount invested.

Settlement risks

Adviser's investment strategies may expose a client to the credit risk of parties with whom Adviser, on behalf of the client or the underlying funds, trades and to the risk of settlement default. Market practices in the emerging markets in relation to the settlement of securities transactions and custody of assets will provide increased risk. Although the emerging markets have grown rapidly over the last few years, the clearing, settlement and registration systems available to affect trades on such markets are significantly less developed than those in more mature world markets which can result in delays and other material difficulties in settling trades and in registering transfers of

securities. Problems of settlement in these markets may affect the net asset value and liquidity of a client's portfolio or investments in such portfolios.

Emerging Markets

Adviser's investment strategies may include direct and indirect investments in securities in emerging markets and such investments involve special considerations and risks. These include a possibility of nationalization, expropriation or confiscatory taxation, foreign exchange control, political changes, government regulation, social instability or diplomatic developments which could affect adversely the economies of such countries or the value of a client's investments, and the risks of investing in countries with smaller capital markets, such as limited liquidity, price volatility, restrictions on foreign investment and repatriation of capital, and the risks associated with emerging economies, including high inflation and interest rates and political and social uncertainties. In addition, it may be difficult to obtain and enforce a judgment in a court in an emerging country. The economies of many emerging market countries are still in the early stages of modern development and are subject to abrupt and unexpected change. In many cases, governments retain a high degree of direct control over the economy and may take actions having sudden and widespread effects. Investments in products of emerging markets may also become illiquid which may constrain Adviser's ability to realize some or all of a client's portfolio holdings. Accounting standards in emerging market countries may not be as stringent as accounting standards in developed countries.

Investment Concentration

Some client accounts may have a high concentration in one sector, industry, issuer or security that may subject such accounts to greater risk of loss in the event such investments take an economic downturn.

Material Risks for Particular Types of Securities

The Adviser does not invest in a specific security or product type. The material risks involved with investing are described above.

Risk of Loss

Please note that investing in securities involves a risk of loss that you, as a client, should understand and be willing to bear. Clients are reminded to discuss these risks with the Adviser.

Item 9 - Disciplinary Information

On 03/25/2024 Mr. Hernandez was discharged by JP Morgan Chase for violating the firm's policy with respect to the acceptance of gifts from a client. This was not related to the sale of securities and no customer harm occurred.

Investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an adviser or the integrity of the adviser's management. Adviser has no information applicable to this Item. Please visit www.advisorinfo.sec.gov at any time to view NEWERA's registration information and any applicable disciplinary action.

Item 10 - Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Mr. Hernandez ("Registered Representative") is also a registered representative of M.S. Howells & Co. In his separate capacity as a registered representative, he will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the registered representative. Neither NewEra, nor its investment advisory representatives, will earn investment advisory fees in connection with any services implemented through its separate capacity as a registered representative where commissions are earned.

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

Code of Ethics and Personal Trading Policies

Pursuant to Rule 204A-1 promulgated under the Adviser's Act, NewEra has adopted a written Code of Ethics (the "Code") that sets forth standards of conduct and federal securities law requirements applicable to all supervised persons as defined in the Adviser's Act. NewEra expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws.

All officers, directors, partners and employees of NewEra and any other person who provides advice on behalf of Adviser and is subject to Adviser's control and supervision (collectively referred to as "Supervised Persons") are required to adhere to the Code.

Prevention of Insider Trading

Adviser has adopted policies designed to prevent insider trading that is more fully described in the Code. Adviser's policy on insider trading applies to securities trading and information handling by all Supervised Persons of Adviser (including spouses, minor children and adult members of their households and any other relative of a Supervised Person on whose behalf Supervised Person is acting) for their own account or the account of any client of Adviser.

Adviser takes its obligation to detect and prevent insider trading with the utmost seriousness. Adviser may impose penalties for breaches of its policies and procedures, even in the absence of any indication of insider trading. Depending on the nature of the breach, penalties may include a

letter of censure, profit “give ups,” fines, referrals to regulatory and self-regulatory bodies and dismissal.

Personal Securities Transactions

Periodic Reports

As more fully described in the Code, “access persons” are required to submit reports detailing their personal securities holdings to the Chief Compliance Officer on an initial basis, a quarterly basis, and an annual basis.

As an alternative to submitting quarterly transaction reports, Adviser requires persons who are “access persons” to submit brokerage statements or trade confirmations as long as such documents contain the information required under Rule 204A-1(b)(2)(i)(A)-(E) under the Advisers Act.

Initial Public Offerings and Limited Public Offerings

Access Persons must obtain prior written approval from the Chief Compliance Officer before investing in initial public offerings (“IPOs”) or limited offerings (i.e., private placements). In the event the Chief Compliance Officer wishes to purchase IPOs or the securities of a private placement for his own employee account, the Chief Compliance Officer must obtain prior written approval from the Adviser’s Board Committee.

Review of Personal Securities Reports

The Chief Compliance Officer (or its designee) is responsible for reviewing the Access Person’s Quarterly Transaction Reports as well as the Initial Holdings Report and the Annual Holdings Report as part of Adviser’s duty to maintain and enforce its Code.

In instances when the Chief Compliance Officer has engaged in personal securities transaction, the Adviser’s Principal shall review the Chief Compliance Officer’s brokerage statements and trade confirmations.

Outside Business Activities and Private Investments of Employees

Unless otherwise reviewed and approved by the Chief Compliance Officer, all employees are required to devote their full time and efforts to the Adviser’s business. As such, no person may make use of either his position as an employee or information acquired during employment or make personal investments in a manner that may create a conflict, or the appearance of a conflict, between the employee’s personal interests and Adviser’s interests. Accordingly, every employee is required to complete a disclosure form and have the form approved by Adviser’s Chief Compliance Officer prior to serving in any outside capacities or making any of the investments more fully described in the Code.

Reporting Violations

All Supervised Persons (any officer, director, partner and employee of Adviser) are required to report actual or known violations or suspected violations of Adviser's Code promptly to the Chief Compliance Officer or his designee.

Any report of a violation or suspected violation of the Code will be treated as confidential to the extent permitted by law.

As part of Adviser's obligations to conduct an annual review of all of its policies and procedures pursuant to Rule 206(4)-7 of the Advisers Act, the Chief Compliance Officer shall review on an annual basis the adequacy of the Code and the effectiveness of its implementation.

Recordkeeping

Adviser maintains the following:

- Copies of the Code;
- Records of violations of the Code and actions taken as a result of the violations;
- Copies of Adviser's supervised persons' written acknowledgement of receipt of the Code;
- Records of Access Persons' personal trading — Initial Holdings Reports, Annual Holdings Reports, and Quarterly Transaction Reports, including any information provided under Rule 204A-1(b)(3)(iii) in lieu of such reports, i.e., brokerage confirmations and transaction reports;
- A record of the names of Adviser's "Access Persons";
- Records of decisions, and the reasons supporting the decision to approve an Access Person's acquisition of securities in initial public offerings or limited offerings; and
- Records of decisions, and the reasons supporting the decision to approve the Chief Compliance Officer's acquisition of securities in initial public offerings or limited offerings.

Acknowledgement of the Code

Each employee will execute a written statement certifying that the employee has (i) received a copy of Adviser's Code; (ii) read and understands the importance of strict adherence to such policies and procedures; and (iii) agreed to comply with the Code.

Training and Education

All Supervised Persons, i.e., all employees, are to receive training on complying with the Code on an annual basis as part of Adviser's annual employee compliance review meeting to ensure that all employees fully understand their duties and obligations and how to comply with the Policy's procedures.

Copies of Adviser's Code

NewEra will provide a copy of the Code to any Client upon request. For a copy, please contact NewEra at (786) 577-9396.

Participation or Interest in Client Transactions and Associated Conflicts of Interest

Adviser has policies that require personnel who develop advice and recommendations for clients to render only disinterested and impartial advice to clients and to comply with other fiduciary obligations, including having an adequate basis in fact for all recommendations and an obligation to recommend only investments that are suitable for the particular client.

The potential conflicts of interest involved in any such transactions are generally governed by Adviser's Code. Pursuant to the stipulations of the Code, Adviser or a related person may buy or sell for itself securities that it also recommends to clients. The potential conflicts of interest involved in such transactions are governed by the Code, which establishes sanctions if its requirements are violated and requires that Adviser and employees place the interests of Adviser's clients above their own.

Investments in Securities by Adviser and its Personnel

Adviser's personnel or a related person of Adviser may invest in the same or similar securities and investments as those recommended to or entered into on behalf of Adviser's clients. The results of the investment activities of Adviser's personnel or related persons for their accounts may differ from the results achieved by or for client accounts managed by Adviser. The conflicts raised by these circumstances are discussed below.

Adviser may recommend or effect the purchase or sale of securities in which its related persons or an affiliate, directly or indirectly, has a position or interest, or of which related or affiliated person buys or sells for itself. Such transactions may also include trading in securities in a manner inconsistent with the advice given to Adviser's clients.

Activities and transactions for client accounts may be impaired or effected at prices or terms that may be less favorable than would otherwise have been the case had Adviser or related persons not pursued a particular course of action with respect to the issuer of the securities. In addition, in certain instances Adviser's personnel may obtain information about the issuer that could limit the ability of such personnel to buy or sell securities of the issuer on behalf of client accounts.

Transactions undertaken by Adviser's clients may also adversely impact one or more client accounts. Other clients of the Adviser may have, as a result of receiving client reports or otherwise, access to information regarding Adviser's transactions or views that may affect their transactions outside of accounts controlled by Adviser, and such transactions may negatively impact other clients' accounts. A client's account may also be adversely affected by cash flows and market movements arising from

purchase and sale transactions by, as well as increases of capital in and withdrawals of capital from, other clients' accounts. These effects can be more pronounced in less liquid markets.

The results of the investment activities of a client's account may differ significantly from the results achieved by Advisers related persons and from the results achieved by Adviser for other client accounts.

As more fully described above, Adviser has adopted a Code of Ethics. Such Code of Ethics together with Adviser's policies and procedures restrict the ability of certain officers and employees of Adviser from engaging in securities transactions in any securities that its clients have purchased, sold or considered for purchase or sale. Other restrictions and reporting requirements are included in Adviser's procedures and Code of Ethics minimize or eliminate conflicts of interest.

Errors

Errors may occur from time to time in transactions for client accounts. The Adviser will generally correct any such errors that are the fault of the Adviser or an affiliate at no cost to the client, other than costs that the Adviser deems immaterial. To the extent that the subsequent sale of such securities generates a profit to the Adviser, the Adviser may retain such profits, and may, but is not required to, use such profits to offset errors in the future or pay other client-related expenses. The Adviser will not be responsible for any errors that occur that are not the fault of the Adviser or any affiliate.

Privacy Policy

NewEra considers your privacy our utmost concern. NewEra does not share any information of clients with non-affiliated third parties, except such information may be disclosed as necessary to process a transaction an investor has requested, to the extent the investor specifically authorized the disclosure, to service providers or joint marketers who agree to limit their use of such information, and to the extent required or specifically permitted by law or reasonably necessary to prevent fraud, unauthorized transactions or liability.

When Adviser discloses non-public personal information of clients to a non-affiliated third party that provides services to Adviser or engages in joint marketing, Adviser shall:

- notify Clients of the possibility of such disclosure; and
- enter into a contractual agreement with the third party that prohibits the third party from disclosing or using the Clients' information other than to carry out the purposes for which the information was disclosed to the third party.

In particular, Adviser may enter, in compliance with the above conditions, into an agreement with a non-affiliated third party to store the records of Adviser clients and investors including electronic and e-mail records.

For more information about NewEra's privacy policies or to request a brochure describing NewEra's privacy policies contact NewEra at (786) 577-9396.

Item 12 - Brokerage Practices

As part of NewEra's relationship with its clients, its Investment Advisory Agreement provides that client may restrict the discretion and direct brokerage to any broker. The Adviser is authorized in its Investment Advisory Agreement to select other securities brokers, unless the client directs otherwise in the Agreement.

It is the Adviser's policy not to enter into soft dollar arrangements. Adviser does not consider, in selecting or recommending broker-dealers, whether Adviser or a related person receives Client referrals from such broker-dealer.

Best Execution: As an investment advisory company, the Firm has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. The Firm may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

This would justify higher commissions (or their equivalent) than other transactions requiring routine services. If the Firm is directed by the client to direct trades to a specific broker dealer other than the custodian typically used for trade execution, it is disclosed that the Firm's ability to negotiate commissions (where applicable), obtain volume discounts, or otherwise obtain best execution may not be as favorable as might otherwise be obtained.

Additionally, the research and services provided by the broker-dealer with respect to the particular type of investment may be a factor in the selection process. The commissions payable to such broker-dealers may in certain cases be higher than those attainable from other broker-dealers who do not provide such research and services. Ordinarily, such research will be used to service all of the Adviser's accounts. Under the Adviser's standard Investment Advisory Agreement, the client can revoke the Adviser's authority to select the broker-dealer for the accounts.

Order Aggregation: The Firm may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of the Firm's investment Advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of

their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive, to the extent possible, the same execution price (average share price) for the securities purchased or sold in a trading day. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. The Firm may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

NewEra never discloses the nonpublic personal information about its clients to anyone except to those persons necessary to effect the transactions and provide the services that the clients requires (such as broker-dealers, custodians, etc.) or as otherwise provided by law.

A copy of NewEra's Business Continuity Plan Disclosure Document will be provided to the Client at the time of account opening as well as when material changes to the plan occur. A copy of this document may be obtained at any time upon request.

Brokerage for Client Referrals: Adviser does not direct brokerage to particular brokers in consideration for client referrals.

Item 13 - Review of Accounts

Client accounts are monitored on a regular and continuous basis by the Advisor. Formal review of the accounts is generally conducted at least annually or more frequently depending on the needs of the Client. Additionally, accounts are, in most cases, reviewed more frequently through various means, including telephone calls, in-person meetings, or electronic communications. Discretionary and non-discretionary investment advisory accounts are periodically reviewed by the Advisor and Compliance Officer to analyze if the account is being managed in accordance with the client's chosen investment objective, and to verify the accuracy of account holdings and fee deductions. ***Factors Triggering a Review***

There are no specific triggering factors leading to a review, however, the Adviser may conduct account reviews upon client request.

Client Reports

Clients of the Adviser receive quarterly reports from their qualified Custodian. In some cases, the Adviser will also provide an investment report quarterly or as agreed between the Adviser and the Client. NewEra may issue a quarterly written report with a summary report of the Assets Under Management for the quarter and Year-to-Date, as well as the annualized performance of the portfolio. While NewEra may provide Client with a summary report, the custodians statements are

the official record of the holdings and values of the assets contained therein and that Client should treat those statements as such.

Item 14 - Client Referrals and Other Compensation

NewEra, from time to time, receives client referrals, and such referrals often come from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources. Additionally, NewEra may also refer Clients to various unaffiliated, non-advisory professionals (for example, attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. NewEra does not currently offer or pay compensation for referrals, but NewEra does not have a policy against entering into a promoter and/or solicitor agreement in the future.

Compensation for Client Referrals:

In the event a Client is or may be referred to the Adviser by either an affiliated or unaffiliated party with whom NewEra has a promoter or solicitor's agreement (herein "Promoter") said Promoter may receive, directly or indirectly, compensation for the Client referral. In such instances, the Adviser will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Adviser and shall not result in any additional charge to the Client.

Item 15 - Custody

All assets are typically held at qualified custodians; the custodians provide account statements directly to clients at their address of record at least quarterly. Therefore, aside from debiting fees from its clients' accounts to pay for services rendered, NewEra does not maintain custody of its clients' funds. Clients receive monthly or quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the client's investment assets.

Clients should carefully review the statements received from the different custodians and compare those statements to the reports provided by NewEra. Any discrepancies, errors or omissions must be reported immediately to Yaniris Elward as Chief Compliance Officer of NewEra at yelward@newerawealthadvisors.com.

Item 16 - Investment Discretion

NewEra may receive discretionary authority from Client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. However, these purchases or sales may be subject or may be exercised in a manner consistent with the guidelines, limitations or investment objectives set forth by the Client for the particular client account(s) and agreed to by

NewEra. The granting of discretionary authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority.

When selecting securities and determining amounts, Adviser observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Adviser in writing.

Item 17 - Voting Client Securities

As a matter of Firm policy, NewEra does not have any authority to and does not vote proxies on behalf of our advisory clients. Clients retain the responsibility for voting proxies for any and all securities maintained in Client portfolios.

Clients will receive proxy statements 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

The Adviser has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients. NewEra has not been the subject of bankruptcy proceedings. In addition, NewEra is not required to deliver a balance sheet along with this Disclosure Brochure as the Adviser does not collect fees of \$1,200 or more for services to be performed six (6) months in advance.

Item 19 – Requirements for State Registered Advisors

1. State Registered Advisors are required to identify each of their principal executive officers and management persons, and describe their formal education and business background:

Victor Hernandez – Principal (CRD 5015535)

Educational Background:

- Bentley University; bachelor's in science, Finance; 2005
- IE University; MBA; 2012

Securities Industry Examinations:

- Series 7, General Securities Representative, 02/01/2006
- Series 63, Uniform Securities Agent State Law Exam, 12/18/2006
- Series 65, Uniform Investment Adviser Law Exam, 08/09/2018

Business Experience:

- J.P. Morgan Wealth Management, Financial Advisor, 2018 – 2024
- J.P. Morgan Private Bank, Banker, 2011 – 2018

- HSBC Private Bank, Investment Officer, 2008 – 2011
- J.P. Morgan Private Bank, Analyst, 2005-2008

Yaniris Elward – CCO (CRD 7915498)

Educational Background:

- New York University; BA in Economics; 2004
- Northeastern University School of Law; Juris Doctor; 2008

Business Experience:

- Elward Law Firm - Attorney
- US Century Bank – Associate Legal Counsel

You may access Mr. Hernandez & Mrs. Elward's regulatory file by following this link:

[http://www.adviserinfo.sec.gov/\(S\(v0s1j0nivr4bef45caxf1155\)\)/IAPD/Content/Search/iapd_Search.aspx](http://www.adviserinfo.sec.gov/(S(v0s1j0nivr4bef45caxf1155))/IAPD/Content/Search/iapd_Search.aspx)

- 2. State Registered Advisers are required to describe any business in which they are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.**

Mr. Hernandez is a registered representative of MS Howells, a non-affiliated broker dealer.

- 3. State Registered Advisers are required to disclose if the firm or a management person has been involved in one of the events listed below and disclose all material facts regarding the event:**

Neither Mr. Hernandez nor Mrs. Elward have been found liable in any arbitration alleging damages in excess of \$2,500; or in a civil, self-regulatory organization, or administrative proceeding involving any of the following events:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

You may access their regulatory files by following these links:

<https://adviserinfo.sec.gov/individual/summary/5015535> and
<https://adviserinfo.sec.gov/individual/summary/7915498>

FORM ADV PART 2B - BROCHURE SUPPLEMENT

October 2024

This brochure supplement provides information about the supervised persons listed below that supplement the NewEra Wealth Advisors Inc.'s Brochure. Please contact Yaniris Elward, CCO, if you have any questions about the contents of this supplement.

List of Supervised Persons

Victor K. Hernandez | Principal / Investment Manager
victor.hernandez@newerawealthadvisors.com

Yaniris Elward | Chief Compliance Officer
yelward@newerawealthadvisors.com

NewEra WEALTH ADVISORS INC.

121 Alhambra Plaza
Suite 1000
Telephone: 786 788-5199

Additional information about the above supervised persons is available on the SEC's website at www.adviserinfo.sec.gov.

Victor K. Hernandez – CRD No. 5015535

Principal
YOB: 1983

Item 2 - Educational Background and Business Experience

Educational Background:

- Bentley University; Bachelor in Science, Finance; 2005
- IE University; MBA; 2012

Securities Industry Examinations:

- Series 7, General Securities Representative, 02/01/2006
- Series 63, Uniform Securities Agent State Law Exam, 12/18/2006
- Series 65, Uniform Investment Adviser Law Exam, 08/09/2018

Business Experience:

- J.P. Morgan Wealth Management, Financial Advisor, 2018 – 2024
- J.P. Morgan Private Bank, Banker, 2011 – 2018
- HSBC Private Bank, Investment Officer, 2008 – 2011
- J.P. Morgan Private Bank, Analyst, 2005-2008

Item 3 - Disciplinary Information

On 03/25/2024 Mr. Hernandez was discharged by JP Morgan Chase for violating the firm's policy with respect to the acceptance of gifts from a client. Not related to the sale of securities and no customer harm.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hernandez. However, we do encourage you to independently view the background of Mr. Hernandez on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or his CRD# 5015535.

Item 4 - Other Business Activities

Mr. Hernandez is a registered representative of HS Howells, a non-affiliated broker dealer; in addition, Mr. Hernandez has an interest in real estate rental properties.

Item 5 - Additional Compensation

Mr. Hernandez does not receive additional compensation outside of NewEra Wealth Advisors Inc. He is compensated by HS Howells in the form of brokerage commissions for his activities as registered broker dealer representative.

Item 6 - Supervision

Individual(s) responsible for supervising the activities of Mr. Hernandez is the Chief Compliance Officer of NewEra, Yaniris Elward.

YANIRIS ELWARD – CRD No.7915498

**Chief Compliance Officer
YOB 1982**

Item 2 - Educational Background and Business Experience

Educational Background:

- New York University; BA in Economics; 2004
- Northeastern University School of Law; Juris Doctor; 2008

Business Experience:

- Elward Law Firm - Attorney
- US Century Bank – Associate Legal Counsel

Item 3 - Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Elward. She has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Elward.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Elward. However, we do encourage you to independently view the background of Ms. Elward on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her CRD# 7915498.

Item 4 - Other Business Activities

Ms. Elward is not engaged in any other investment related activities but does have an interest in real estate rental properties.

NewEra Wealth Advisors Inc. require its RRs and IARs to provide pre-written disclosure of any Outside Business Activity so that the activity may be appropriately reviewed and supervised.

Item 5 - Additional Compensation

Ms. Elward does not receive any additional compensation from any other source.

Item 6 - Supervision

Individual(s) responsible for supervising the activities of Ms. Elward is Victor Hernandez, whom you may contact at victor.hernandez@newerawealthadvisors.com.

NewEra Wealth Advisors Inc. has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of NewEra Wealth Advisors Inc.