

## Item 1: Cover Page

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# **American Expats in Europe Ltd.**

## **Form ADV Part 2A**

### **Investment Adviser Brochure**

Leam West Recess  
County Galway, H91KT0F  
Republic of Ireland  
(+353) 831 - 682584

March 2024

This Brochure provides information about the qualifications and business practices of American Expats in Europe Ltd. (“we”, “us”, “our”). If you have any questions about the contents of this Brochure, please contact Jeremy C. Cave, Chief Operating Officer and Chief Compliance Officer at (+420) 739 320920 or [jeremy@AmericanExpatsEurope.com](mailto:jeremy@AmericanExpatsEurope.com).

Additional information about our Firm is also available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). 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.

We are a registered investment adviser. Please note that use of the term “registered investment advisor” and a description of the Firm and/or our employees as “registered” does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

## Item 2: Summary of Material Changes

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In this Item of American Expats in Europe Form ADV 2, we are required to discuss any material changes that have been made to Form ADV since the last Annual Amendment.

### **Material Changes since the Last Update**

Since the last Annual Amendment filing on March 23, 2023, the Firm has the following material change to report:

- We rewrote Forms ADV 2A and 2B, and as such, will deliver these documents in their entirety to all clients. We recommend that all recipients read this document carefully and in its entirety.

### **Annual Update**

You will receive a summary of any material changes to our Form ADV brochure within 120 days of our fiscal year end. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of the last annual update of the ADV.

The Supplement to our Form ADV Brochure (Form ADV Part 2B) provides you with information regarding our employees that provide investment advice.

### **Full Brochure Available**

Our Form ADV may be requested at any time, without charge by contacting Jeremy C. Cave, Chief Operating Officer, and Chief Compliance Officer at (+420) 739 320920 or [jeremy@AmericanExpatsEurope.com](mailto:jeremy@AmericanExpatsEurope.com). Additional information about the Firm is also available via the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any employees affiliated with the Firm who are registered as investment adviser representatives.

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## Item 4: Advisory Business

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### **Firm Information**

This Disclosure Brochure ("Form ADV Part 2") provides information regarding the qualifications, business practices, and the advisory services provided by American Expats in Europe LTD's ("AEX" or "the Firm", "we", "us", "ours").

We are a federally Registered Investment Adviser with the U.S. Securities and Exchange Commission ("SEC"). We were founded in 2022 and are owned and operated by Frank M. Gibney, Managing Director, and Jeremy C. Cave, Chief Operating Officer and Chief Compliance Officer.

### **Types of Advisory Services**

#### ***Account Establishment Services***

We provide account establishment services as follows:

- Several meetings with the client (virtual and/or in person), including:
  - Introduction
  - Delivery of discovery document, risk profile assessment, disclosure documents
  - Review of the client's risk profile and financial objectives
  - Review of current funds and recommendations
  - Registration for access to custodial platforms
- Completion of account opening and asset transfer forms.
- Liaise with custodians.
- Placement of initial transfer instructions.

#### ***Wealth Management***

We typically provide a variety of wealth management services to individuals and families, in several areas of a client's financial situation, depending on their goals, objectives, and resources.

We provide customized investment management solutions for our clients. We will manage advisory accounts on a discretionary or non-discretionary basis, as agreed upon with the client. We work with each client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation.

We will then construct a portfolio consisting of exchange traded funds ("ETFs"), mutual funds, individual stocks and bonds, or other securities.

In providing wealth management services, we may also recommend the portfolio management services of other unaffiliated independent investment advisers based on the needs of the client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected independent manager. Clients

should refer to the selected independent advisory firm's Form ADV Parts 2A, 2B, or other disclosure document for a full description of the services offered. We are available to meet with clients on a regular basis, or as determined by the client, to review the account. We do not receive any compensation for the selection of other managers.

We may also provide advice about any type of legacy position or investment otherwise held in client portfolios.

### **Wrap Fee Programs**

A "wrap-fee" program is one that provides the client with advisory and brokerage execution services for an all-inclusive fee. The client is not charged separate fees for the respective components of the total service. We do not sponsor, manage, or participate in a Wrap Fee Program.

### **Tailored Relationships**

We tailor advisory services to the individual needs of the client. Clients may place reasonable investment restrictions on their portfolios, including bans on investing in particular industries, and investing in limited amounts of securities. All limitations and restrictions placed on accounts must be presented to us in writing.

### **Fiduciary Statement**

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act, ("ERISA") and/or the Internal Revenue Code, ("IRC"), as applicable, which are laws governing retirement accounts.

We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must take into consideration each client's objectives and act in the best interests of the client. We are prohibited from engaging in any activity that is in conflict with the interests of the client. We have the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances, and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have a reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Regulations prohibit us from:

- Employing any device, scheme, or artifice to defraud a client;
- Making any untrue statement of a material fact to a client or omitting to state a material fact when communicating with a client;
- Engaging in any act, practice, or course of business which operates or would operate as fraud or deceit upon a client; or
- Engaging in any manipulative act or practice with a client.

We will act with competence, dignity, integrity, and in an ethical manner, when working with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

### **Assets Under Management**

As of December 31,2023, we managed \$2,569,664 in client assets; all managed on a non-discretionary basis.

## Item 5: Fees and Compensation

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We base our fees on a percentage of account assets committed upon the establishment of the relationship, and thereafter, on assets under management. These fees are described below.

### **Compensation – Account Establishment Services**

At the inception of the client engagement, we charge a one-time Account Establishment Fee (also, “establishment fee”) which is a service fee reasonably related to the up-front services and costs we expect to incur at the beginning of the investment advisory relationship. The costs and time expended by us in establishing the account (so we can provide the Wealth Management services) is generally proportional to the account size, and therefore, it is based on the initial client account assets committed and charged as follows:

<b>Account Establishment Services (Based on Initial Account Value)</b>	<b>Annual Fee</b>
Up to \$500,000	1.25%
\$500,001 to \$1,000,000	1.1%
\$1,000,001 and above	1.00%

Establishment fees are in addition to the Wealth Management fees described below and are collected on the transfer of funds to be managed. ***The maximum establishment fee is \$20,000. Establishment fees are negotiable and non-refundable.***

**Note:** The account establishment fee described above that is charged by the adviser is not a common fee for U.S. based SEC registered advisors, but it is not uncommon for this type of fee to be charged by advisers located in Europe for clients who reside outside the U.S. Therefore, similar advisory services and account establishment services may be available to you elsewhere at lower cost.

### **Compensation – Wealth Management Services**

Wealth Management fees are charged an annual fee of 1.5% on total assets under management. The asset-based fee is billed on a monthly basis, in arrears, based upon the market value of the Household Assets, including cash, on the last day of the month as valued by the custodian.

### **Calculation and Payment**

The specific manner in which we charge fees is established in a client’s written agreement with us. Clients may elect to be invoiced directly for fees or to authorize us to directly debit fees from client accounts.

### **Other Fees**

There are no additional types of fees or expenses that our clients pay in connection with the delivery of advisory services.

### **Agreement Terms**

Either party may terminate an agreement at any time by notifying the other in writing. If the client made an advance payment, we would refund any unearned portion of the advance payment.

If the client made a payment in arrears, we would collect any earned yet unpaid fees.

### **Cash Balances**

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

### **Retirement Plan Rollover Recommendations**

As part of our investment advisory services to our clients, we may recommend that clients roll assets from their employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will advise on the client's behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts.

If the client elects to roll the assets to an IRA that is subject to our advisement, we will charge the client an asset-based fee as set forth in the advisory agreement the client executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to the client (i.e., receipt of additional fee-based compensation). Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, clients are under no obligation to have the assets in an IRA advised on by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in our clients' best interests and not put our interests ahead of our clients'.

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of our clients' when making recommendations (give loyal advice);



- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in our clients' best interests;
- charge no more than a reasonable fee for our services; and
- give clients basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

1. leaving the funds in the employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide clients with an explanation of the advantages and disadvantages of both account types and document the basis for our belief that the rollover transaction we recommend is in your best interests.

### **General Information on Compensation and Other Fees**

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low-cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, 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 funds 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 fees, and we shall not receive any portion of these commissions, fees, and costs.

All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are

described in each fund's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund directly, without our services. In that case, the client would not receive our services, which are designed, among other things, to assist the client in determining which mutual funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

#### **Mutual Fund Share Class Selection**

Similar investment management services may (or may not) be available from other investment advisers for a lower fee. Investment management fees, which include investment management and transaction costs, may be more or less costly than paying for the services separately, depending upon the investment advisory fees charged, the number of transactions for the account, the mutual fund share class you purchase and the underlying 12(b)-1 fee, and the level of brokerage and other fees that would be payable if you obtained the services available under the program individually.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

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“Performance-based fees” are fees based on the capital gains or capital appreciation in an account. We do not charge performance-based fees. “Side-by-side management” refers to the practice of managing both accounts that are charged a performance-based fee and accounts that are charged other types of fees, such as asset-based fees and hourly fees. Because we do not charge performance-based fees, we do not engage in side-by-side management.

## Item 7: Types of Clients

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### **Types of Clients**

We provide services to individuals, high net worth individuals, and pension and profit-sharing plans.

### **Account Minimums**

We have no minimum account size.

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

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### **Methods of Analysis**

We use a number of analysis methods in formulating our investment advice and/or managing client assets. These may include fundamental, cyclical and/or charting analysis. Our analysis is completed using Barchart, Morningstar, Bloomberg and other research tools.

### **Investment Strategies**

We reserve the right to advise clients on any other type of investment that we deem appropriate based on the client's stated goals and objectives. We may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

### **Risk of Loss**

Investing in securities involves risk of loss that clients should be prepared to bear.

**All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risks of loss:**

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its

income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties (i.e., Non-traded REITs and other alternative investments) are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **High - Yield Bond Risks:** High yield bond investments carry certain unique risks. Their underlying businesses may carry too much debt relative to their earnings, or a very cyclical business model that results in volatile cash flows. High yield bonds have a greater risk than other fixed income investments in that the issuer will not be able to make timely interest or principal payments and ultimately may default on its debt obligations.
- **Structured Notes:** Structured note investments are aimed at reducing volatility in client portfolios; however, they involve certain specific risks. The performance of the notes is related to the performance of the underlying indices (i.e., equities, commodities, etc.), so if the underlying index were to decline one hundred percent (100%), then the investment would result in the loss of the entire investment. The payment of any amount due at maturity is subject to the issuer's ability to pay its obligations when they become due. The notes are not listed on any securities exchange. There may be no market for selling these notes before maturity. Neither the issuer nor the Firm is obligated to buy the notes. If the issuer does buy the note back before maturity, the fact that selling and structuring costs were included in the original purchase price will negatively impact the price to be paid by the issuer.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **Custodial Risk:** This risk is the probability that a party to a transaction will be unable or unwilling to fulfill its contractual obligations either due to technological errors, control failures, malfeasance, or potential regulatory liabilities.

## Item 9: Disciplinary Information

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We are required to disclose all pertinent facts regarding any legal, regulatory, or disciplinary events that would be material to your evaluation of the Firm or the integrity of our management.

There have never been any legal, regulatory, or disciplinary actions against the Firm or our management persons.

## Item 10: Other Financial Industry Activities and Affiliations

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### **Financial Industry Activities**

We are not registered as a broker-dealer, and none of our management persons are registered representatives of a broker-dealer. We are not registered and do not have an application pending as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

We do not have arrangements that are material to our business and clients and investors with a related person who is a broker-dealer, investment company, financial planning firm, commodity pool operator, commodity trading adviser, futures commission merchant, bank or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited liability companies.

### **Financial Industry Activities -Other**

Jeremy C. Cave, Chief Operating Officer and Chief Compliance Officer, is affiliated with Knightsbridge Management International (“KMI”), a European-based asset management firm, acting as a Financial Consultant and Sales Manager. Frank M. Gibney, Managing Director, is affiliated with KMI as a Financial Advisor. In their roles at KMI, Mr. Cave and Mr. Gibney serve non-US connected clients that are not served by the Firm. Neither the Firm, Mr. Cave, nor Mr. Gibney receive any direct or indirect economic benefits, for Firm clients referred to or from KMI.

The Firm does not believe these dual roles by Mr. Cave and Mr. Gibney are material or pose a conflict of interest for the Firm or its clients. This is because Mr. Cave and Mr. Gibney do not cross-market services to any of the Firm’s or KMI’s clients. Currently, the Firm limits its services to only US ex-patriots and US connected clients, while KMI directly services only non-US ex-patriots and non-US connected clients.



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

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### **Code of Ethics**

Our employees must comply with a Code of Ethics and Statement for Insider Trading (the “Code”). The Code describes our high standard of business conduct, and fiduciary duty to our clients. The Code’s key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Our employees must acknowledge the terms of the Code at least annually, and any employee not in compliance with the Code may be subject to termination.

### **Participation or Interest in Client Transactions – Personal Securities Transactions**

Both the Firm and our employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code, described above, is designed to assure that the personal securities transactions, activities, and interests of the employees of the Firm will not interfere with (i) making decisions in the best interest of clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code 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. The Firm may maintain a list of restricted securities that employees may not purchase or sell based upon having (or possibly having) access to inside information. Employee trading is continually monitored under the Code and designed to reasonably prevent conflicts of interest between the Firm and our clients.

### **Participation or Interest in Client Transactions and Principal/Agency Cross Trades**

We do not recommend any securities to our clients in which we have a material financial interest. We do not affect any principal or agency cross securities transactions for client accounts. We also do not cross trades between client accounts.

### **Participation or Interest in Client Transactions – Aggregation**

Neither we, nor our employees aggregate (block) trades with clients.

## Item 12: Brokerage Practices

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### **Research and Other Soft Dollar Benefits**

We do not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Brokerage – Other Economic Benefits”.

### **Brokerage for Client Referrals**

We do not receive client referrals from broker/dealers.

### **Directed Brokerage**

While not routine, the client may direct us to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to “batch” client transactions for execution through other broker-dealers with orders for other accounts managed by us. By directing brokerage, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to our duty of best execution, we may decline a client’s request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests us to arrange for the execution of securities brokerage transactions for the client’s account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We shall periodically and systematically review our policies and procedures regarding recommending broker-dealers to our client in light of our duty to obtain best execution.

### **Brokerage - Other Economic Benefits**

We may have the opportunity to receive traditional “non-cash benefits” from broker/dealers such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing advisors exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client portfolios; ability to have investment advisory fees deducted directly from client portfolios; access to an electronic communication network for client order entry and portfolio information; access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products.

Broker/dealers may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. We have no written or

verbal arrangements whereby we receive soft dollars. While we endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

**Trade Aggregation**

We do not aggregate or block trades.

## Item 13: Review of Accounts

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### **Reviews**

We review all of client's relevant information, including investment portfolios. The individuals completing these reviews are Frank M. Gibney, Managing Director and Jeremy C. Cave, Chief Operating Officer and Chief Compliance Officer.

Portfolios are generally monitored on a quarterly basis; however, reviews could also occur at the time of new deposits, material changes in client's financial information, changes in economic cycles, at our discretion, or as often as the client directs. Reviews entail analyzing securities, sensitivity to overall markets, economic changes, investment results and asset allocation, etc., to ensure the investment strategy and expectations are structured to continue to meet clients' objectives.

### **Review Triggers**

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation, (such as retirement, termination of employment, physical move, or inheritance).

### **Reporting**

Each month, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits, and withdrawals, accrued income, dividends, and performance. We may also provide clients with periodic reports regarding their holdings, allocations, and performance.

## Item 14: Client Referrals and Other Compensation

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### **Other Compensation**

We do not receive any economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

### **Compensation – Client Referrals**

Affiliated and Unaffiliated persons or entities, (“Promoters”) may, from time to time refer, solicit, or introduce clients to our Firm. We may compensate certain Promoters consistent with the requirements of the Investment Advisers Act of 1940 as well as applicable state/local laws and regulations. In return, we will agree to compensate the Promoter for the referral. Compensation to the Promoter is dependent on the prospective client entering into an advisory agreement with us for advisory services. Compensation to the Promoter will be an agreed upon fee related to the advisory fees we expect to receive from the client relationship. These fees can be a one-time fee, or recurring, pursuant to a written agreement retained by both our Firm and the Promoter.

Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor and shall not result in any additional charge to the Client.

## Item 15: Custody

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### **Custody – Fee Debiting**

Clients may authorize us (in the client agreement) to debit fees directly from their account at the broker dealer, bank, or other qualified custodian (“custodian”). The custodian is advised in writing of the limitation of our access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the Firm.

### **Custody – Account Statements**

Clients receive at least quarterly statements from the custodian that holds and maintains client’s investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the reports that we provide. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

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We may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows us to execute trades on behalf of clients. When such limited powers exist between the Firm and the client, we have the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives.

If we have not been given discretionary authority, we consult with the client prior to each trade.

## Item 17: Voting Client Securities

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### **Proxy Voting**

We do not have any authority to and do not vote proxies on behalf of clients, nor do we make any express or implied recommendation with respect to voting proxies. Clients retain the sole responsibility for receiving and voting proxies that they receive directly from either their custodian or transfer agents. Clients may contact us for information about proxy voting.



## Item 18: Financial Information

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We have no financial commitments that impair our ability to meet contractual and fiduciary commitments to clients and we have not been the subject of a bankruptcy proceeding.

We do not require prepayment of fees of both more than \$1,200 per client, and more than six months in advance; and therefore, we not required to provide a balance sheet to clients.

**American Expats in Europe Ltd.**  
**Form ADV Part 2B**  
**Investment Adviser Brochure Supplement**

Leam West Recess  
County Galway, H91KT0F  
Republic of Ireland  
(+353) 831-682584

**Supervisor's Name: Jeremy C. Cave**

**Supervisor of:**  
Frank M. Gibney

March 2024

This Brochure Supplement provides information about the Firm's ("we", "us", "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Jeremy C. Cave, Chief Operating Officer and Chief Compliance Officer at (+420) 739 320920 or [Jeremy@AmericanExpatsEurope.com](mailto:Jeremy@AmericanExpatsEurope.com) if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site using a unique identifying number, known as a CRD number for each employee.

## Item 2: Educational Background and Business Experience

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### **Education and Business Background**

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

### **Supervised Persons**

***Jeremy C. Cave***

Born 1958

CRD #: 7527091

### **Business Background:**

American Expats in Europe Ltd.

2022 to Present

Chief Operating Officer and Chief Compliance Officer

KMI

2005 to Present

Financial Consultant/ Sales Manager

### **Formal Education after High School:**

Bournemouth & Poole College of Art

Society of Industrial Artists and Designers Diploma in Illustration and Design

### **Professional Designations:**

Financial Planning Certificate 3 (UK) LIA Qualification

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***Frank M. Gibney***

Born 1970

CRD #: 7521649

### **Business Background:**

American Expats in Europe Ltd.

2022 to Present

Managing Director

KMI

2019 to Present

Financial Advisor

### **Formal Education after High School:**

UCD Dublin

Diploma/Certificate in Financial Advice

### **Professional Designations:**

Financial Planning Certificate 3 (UK) LIA Qualification

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### **Professional Certifications**

Our employees maintain professional designations, which required the following minimum requirements:

<b><i>Financial Planning Certificate 3</i></b>	
<b>Issued By</b>	Chartered Insurance Institute (UK)
<b>Prerequisites</b>	<ul style="list-style-type: none"><li>• None</li></ul>
<b>Education Requirements</b>	Candidate must complete the following: <ul style="list-style-type: none"><li>• Complete 13-module Personal Finance Units (160 credits / 780 hours)</li><li>• Pass end-of-course examination</li></ul>
<b>Exam Type</b>	End-of-course multiple-choice examination
<b>Continuing Education Requirements</b>	None

### **Item 3: Disciplinary Information**

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Neither we nor any of the nor any employees named in this Form ADV Part 2B have been involved in any activities resulting in a disciplinary disclosure.

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

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Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above.

Disclosure on Fees and Compensation is provided in Form ADV Part 2A Item 5 – Fees and Compensation. Neither we nor any of our Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

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

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No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

### **Item 6: Supervision**

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Jeremy C. Cave, Chief Operating Officer and Chief Compliance Officer supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Mr. Cave supervises these persons by holding regular staff, investment, and other ad hoc meetings. In addition, Mr. Cave regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Mr. Cave may be reached at (+420) 739 320920.