



## Firm Brochure

(ADV Part 2A)

March 1, 2019

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[www.EAGWealth.com](http://www.EAGWealth.com)

### Item 1 – Cover Page

This Brochure provides information about the qualifications and business practices of Eugenias Advisory Group, LLC. If you have any questions about the contents of this Brochure, please contact us at 256.546.3243 and/or [www.EAGWealth.com](http://www.EAGWealth.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

EUGENIAS ADVISORY GROUP, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about EUGENIAS ADVISORY GROUP, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm's CRD number is 146177.

## **Item 2 – Material Changes**

This Brochure, dated January 1, 2019, replaces our last Brochure dated September 1, 2018. This section discusses only specific material changes made to the Brochure since our last annual amendment dated January 1, 2018 and provides a summary of those changes. We have had the following material changes since our last amendment dated January 1, 2018.

Item 5 – Wealth Advisory Services fee has changed to add another tier. Also, a minimum fee has been added.

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Velda A. Eugenias CEO/CCO at 256.546.3243 or [velda@EAGWealth.com](mailto:velda@EAGWealth.com). Our Brochure is also available on our web site [www.EAGWealth.com](http://www.EAGWealth.com), also free of charge.

Additional information about Eugenias Advisory Group, LLC is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Eugenias Advisory Group, LLC who are registered, or are required to be registered, as investment adviser representatives of Eugenias Advisory Group, LLC.

### Item 3 -Table of Contents

Item 1 – Cover Page.....	1
Item 2 – Material Changes.....	2
Item 3 -Table of Contents.....	3
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation.....	6
Item 6 – Performance-Based Fees and Side-By-Side Management .....	7
Item 7 – Types of Clients.....	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	7
Item 9 – Disciplinary Information.....	8
Item 10 – Other Financial Industry Activities and Affiliations.....	8
Item 11 – Code of Ethics .....	8
Item 12 – Brokerage Practices.....	9
Item 13 – Review of Accounts.....	12
Item 14 – Client Referrals and Other Compensation .....	12
Item 15 – Custody .....	12
Item 16 – Investment Discretion .....	13
Item 17 – Voting Client Securities.....	13
Item 18 – Financial Information .....	14

#### Brochure Supplements

Velda A. Eugenias.....	15
Mauricio Cortes Resendiz.....	19

#### **Item 4 – Advisory Business**

**Eugenias Advisory Group, LLC** (hereinafter “EAG”) was formed in April 1, 2008 by Velda A. Eugenias. Ms. Eugenias is the majority owner of this limited liability company. EAG offers a range of services to its clients. Services include Financial Planning, Portfolio Management and ERISA regulation 3(21) or 3(38). As of December 31, 2018 EAG manages approximately \$123.5 million. \$116.2 million are managed on a discretionary basis and \$7.3 million are managed on a non-discretionary basis..

##### Financial Planning Services

Financial Planning may include plans that address one or more areas of a client's financial situation, such as investment portfolio evaluation and design, retirement planning, tax planning, college funding, estate planning, risk management and small business consulting. Financial Planning services generally include the following:

- (a) Gathering factual information concerning the client's personal and financial situation;
- (b) Assisting the client in establishing financial goals and objectives;
- (c) Analyzing the client's present situation and anticipated future activities in light of the client's financial goals and objectives;
- (d) Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- (e) Making recommendations to help achieve goals and objectives;
- (f) Designing an investment portfolio to help meet the goals and objectives of the client;
- (g) Providing ongoing portfolio management, if requested (see Investment Advisory section below);
- (h) Review existing college (if applicable) and retirement savings plans, and make recommendations for changes as necessary;
- (i) Coordinating plans with clients' attorney, accountant or other advisors;
- (j) Reviewing goals and objectives; measuring progress toward these goals and objectives, and recommending revisions as necessary.

The degree and timing of Financial Planning services are determined by the client. Accordingly, such services may or may not be continuous in nature. The term of the agreement is open ended and either party may terminate the agreement. EAG will accept the client's request to terminate services immediately and not hold them to a 30 day written notice however; EAG will give the client a 30 day written notice before terminating the service.

### Investment Advisory Services (provided as investment management only or part of wealth advisory services)

Advisory services include ongoing and continuous monitoring of the portfolio. Investment management is performed on a discretionary management basis unless otherwise agreed upon with Client. Accordingly, EAG has the authority to manage and direct the client's portfolio, with respect to all purchases, sales, reinvestment and all other investment activities in the portfolio, all without prior consultation with the Client. While EAG provides advice on several types of securities, the majority of portfolios utilize investments in mutual funds and ETFs. The discretionary authority granted by the client does not give EAG the authority to take custody of Clients' securities except for debit of Advisory fees. The term of the agreement is open ended and either party may terminate the agreement.

### ERISA Plans

Eugenias Advisory Group is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Eugenias Advisory Group only charges fees for investment advice based on a percentage of assets managed. Eugenias Advisory Group does not receive any commissions or 12b-1 fees.

Retirement Rollovers-No Obligation/Conflict of Interest: A client leaving an employer typically has four options (and may engage in a combination of these options): 1) leave the money in his former employer's plan, if permitted, 2) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, 3) rollover to an Individual Retirement Account (IRA), or 4) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

Eugenias Advisory Group may recommend an investor roll over plan assets to an IRA managed by Eugenias Advisory Group. As a result, Eugenias Advisory Group may earn an asset-based fee; however, a recommendation that a client or prospective client leave their plan assets with their old employer will result in no compensation. Eugenias Advisory Group has an economic incentive to encourage an investor to roll plan assets into an IRA that Eugenias Advisory Group will manage.

There are various factors that Eugenias Advisory Group may consider before recommending a rollover, including but not limited to: i) the investment options available in the plan versus the investment options available in an IRA, ii) fees and expenses in the plan versus the fees and expenses in an IRA, iii) the services and responsiveness of the plan's investment professionals versus those of Eugenias Advisory Group, iv) required minimum distributions and age considerations, and vi) employer stock tax consequences, if any. No client is under any obligation to roll over plan assets to an IRA managed by Eugenias Advisory Group.

**Item 5 – Fees and Compensation**

General information on fees:

The Client engagement begins the day Client signs the Client Advisory Agreement. EAG begins working for the Client before assets are received into the EAG platform. Fees will accrue beginning with the first day of the Client Advisory Agreement and are payable quarterly, in arrears, using the gross value of the investment portfolio as of the last business day of the prior quarter, regardless of when assets are received into EAG platform. The Client Advisory Agreement may be terminated by either party as stated above. However, in the event of termination, any paid but unearned fees will be promptly refunded to the client, and any fees due to EAG from the Client will be debited from an account or paid promptly by check.

All fees paid to EAG for investment advisory services are separate and distinct from the fees and expenses charged by custodians and mutual fund companies (described in each fund's prospectus). These fees can include a management fee and other expenses. If the fund also imposes a sales charge, a client could pay an initial or deferred sales charge. Fees paid to EAG are exclusive of all custodial and transaction costs paid to account custodian, brokers or other third party consultants and EAG shall not receive any portion of these commissions, fees, and costs. The client should review all fees charged by mutual funds, ETFs, the custodian, EAG and others to fully understand the total amount of fees to be paid by the client.

Financial Planning Fees:

Financial Planning fees are generally calculated at \$300 per hour and the total cost will vary with the complexity of each Client's individual circumstances. EAG will provide the Client with an estimate of fee prior to beginning any work. Fees normally range from \$2,500 to \$10,000 depending on complexity and time involved. Planning fees will be invoiced at \$500 down and invoiced at least quarterly as the work is finalized. A final invoice and a letter closing the planning engagement will be presented to the client when the Client and Planner deem the work complete.

Wealth Advisory Service Fees:

Fees for managing investment accounts are based on a percentage of assets under management, are charged quarterly in arrears, and are calculated based on the value of the managed assets at the end of the prior quarter. Under no circumstances will fees be calculated based on a percentage of capital gains in the portfolio. Advisor reserves the right to accept less than the stated minimum assets to manage.

The fee schedule for these services is as follows.

**Wealth Advisory Services**

Up to \$1,000,000 .....	1.20%
\$1,000,001 - \$2,000,000 .....	0.85%
\$2,000,001 - \$5,000,000 .....	0.75%
Greater than \$5,000,001 .....	0.50%
Minimum Fee charged .....	\$1,500 quarter

For all new engagements, \$3,500 will be due upon signing the new Client Advisory Agreement for onboarding and initial Financial Planning. Minimum assets under management will be \$2,000,000 based on the above fee schedule and the quarterly minimum fee is \$5,125.

**ERISA 3(21) Advisor Fee Schedule**

Up to \$2,000,000 .....	0.75%
\$2,000,001 - \$5,000,000 .....	0.50%
Greater than \$5,000,001 .....	0.35%

If assets fall below the stated minimum charge, the fee may exceed the percentage shown above.

ERISA Plans do not include any Financial Planning. Fees are NOT subject to negotiation. Fees are due at the end of each calendar quarter, and are either deducted directly from the client account(s), or billed to the client for remittance. The Client will receive an invoice of the fee with a written notice that the account will be debited 10 days from the date of invoice or that the fee is due and payable 10 days from invoice.

Pre-existing advisory clients are subject to EAG's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients due to grandfathering of minimum account requirements. Periodically, EAG will increase fees to offset inflation. When this occurs EAG will notify the client in advance of the increase.

**Item 6 – Performance-Based Fees and Side-By-Side Management**

EAG does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

**Item 7 – Types of Clients**

EAG provides advisory services to the following types of clients:

- Individuals & Families
- High net worth individuals
- Pension and profit sharing plans
- Trusts and charitable organization

For all new engagements, \$3,500 will be due upon signing the new Client Advisory Agreement for onboarding and initial Financial Planning. Minimum assets under management will be \$2,000,000 based on the above fee schedule and the quarterly minimum fee is \$5,125.

**Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

The Investment Committee reviews the allocation annually. Security analysis methods at EAG include fundamental and strategic analysis. Information used consists of Morningstar, fund prospectuses, financial magazines, financial articles, and research material prepared by others. The investment team periodically attends on-site and off-site visits, conference calls, and industry conferences with fund representatives.

A research report is produced for each of the asset categories represented in the models. This report takes into account a host of factors including statistical/quantitative measures (such as Sharpe Ratio, beta, etc), qualitative measures (such as fund size, manager's investment in the fund, etc) and operational issues (such as minimum purchase amount, fund availability, etc.). Funds or ETFs chosen are incorporated into client portfolios based on the client's allocation model. Portfolios are reviewed at least annually and can be as often as quarterly. All Clients are advised that it remains their responsibility to notify EAG of any changes in their investment objective and/or financial situation. Any perceived need for change is then considered for each client portfolio on an individual basis. We are careful to explain to Clients that "Investing in securities involves risk of loss that clients should be prepared to bear."

### **Item 9 – Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of EAG or the integrity of EAG's management. EAG has no information applicable to this Item at this time.

### **Item 10 – Other Financial Industry Activities and Affiliations**

At the present time EAG, its principal or any of its affiliates has no other business activities or financial industry affiliations. The Advisors within EAG are focused only on the work we do here at EAG.

### **Item 11 – Code of Ethics**

EAG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at EAG must acknowledge the terms of the Code of Ethics annually, or as amended. EAG anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which EAG has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which EAG, its affiliates and/or clients, directly or indirectly, have a position of interest. EAG's employees and persons associated with EAG are required to follow EAG's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of EAG and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for EAG's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of EAG will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of EAG's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market

activity by a client in a security held by an employee. Employee trading is monitored under the Code of Ethics to reasonably prevent conflicts of interest between EAG and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with EAG's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. EAG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

EAG's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Velda A. Eugenias.

It is EAG's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. EAG will also not cross trades between client accounts. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account.

## **Item 12 – Brokerage Practices**

All clients have the opportunity to select the custodian and/or broker-dealer of their choice. Depending on the choice made by the client, EAG may or may not have the opportunity to negotiate a better rate on commissions paid by the client, and EAG's ability to obtain best execution may be impaired. When clients are seeking custodial services EAG will recommend qualified custodians Fidelity Institutional Wealth Services (Fidelity) or Charles Schwab and Co., Inc. (Schwab). EAG is independently owned and operated and is not affiliated with either Fidelity or Schwab. Fidelity and/or Schwab will hold client assets in a brokerage account and buy and sell securities when EAG instructs them to. While we recommend that clients use either Fidelity or Schwab as custodian/broker, the client will decide whether to do so and will open account(s) with either Fidelity or Schwab by entering into an account agreement directly with them. EAG does not open the account for the client, although we may assist you in doing so.

Fidelity provides services to EAG through their Institutional Wealth Services program (FIWS). This program offers a dedicated team to EAG which enables EAG to better serve Client needs. EAG has no affiliation with Fidelity or any of its subsidiaries.

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like EAG. Schwab Advisor Services provides EAG and our clients with access to its institutional brokerage — trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers.

## How EAG Selects Custodians

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, trading, other fees, etc.)
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below
- Brokerage and Custody Costs

For clients' accounts that are maintained with either Fidelity or Schwab, they generally do not charge the client separately for custody services but are compensated by charging the client commissions or other fees on trades that it executes or that settle into the client's account. In addition to commissions, Fidelity or Schwab charges the client a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your custodial account. These fees are in addition to the commissions or other compensation the client pays the executing broker-dealer. Because of this, in order to minimize trading costs, EAG has Schwab or Fidelity execute most trades for the account maintained with that custodian. EAG has determined that having Schwab or Fidelity execute most trades is consistent with EAG's duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

EAG receives some economic benefits from Fidelity and Schwab including research and other soft dollar benefits. Some of these soft dollar benefits include ongoing training, educational webinars,

seminars, and software for acquiring daily pricing on the clients' securities and also some third party discounts and research. Aggregating the purchase or sale of securities for various client accounts can produce a lower cost for transactions. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research and other services which will help EAG in providing investment advisory services to all EAG clients. Research services may be useful in servicing all of EAG's clients, and not all research may be useful for the account for which the particular transaction was effected. Clients who choose a different broker dealer may limit EAG's ability to provide performance reporting on certain accounts. EAG may at times elect to execute trades through other broker/dealers other than Fidelity Brokerage Services LLC or Charles Schwab and Co., Inc. At all times, when given the discretion to do so, EAG will endeavor to select those brokers or dealers which will provide the best services along with consideration given to fees to be paid by the Client.

### **Products and Services Available to EAG From Fidelity / Schwab**

Fidelity and Schwab Co provides EAG and clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to retail customers. Fidelity and Schwab also make available various support services. Some of those services help EAG manage or administer clients' accounts, while others help EAG manage and grow our business. Fidelity and Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to EAG of products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Following is a more detailed description of these support services:

#### Services That Benefit the Client.

Fidelity and Schwab's brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Fidelity and Schwab include some to which EAG might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

#### Services That May Not Directly Benefit the Client.

Fidelity and Schwab also makes available to EAG other products and services that benefit EAG but may not directly benefit the client or their account. These products and services assist EAG in managing and administering our clients' accounts. They include investment research, both Fidelity and Schwab's own and that of third parties. EAG may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Fidelity or Schwab. In addition to investment research, Fidelity or Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data

- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

#### Services That Generally Benefit Only EAG.

Fidelity and Schwab also offer other services intended to help EAG manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Fidelity and Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to EAG. Fidelity and Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Fidelity and Schwab may also provide EAG with other benefits, such as occasional business entertainment of our personnel.

Through Fidelity and Schwab, EAG executes trades for the purchase and sale of individual securities, mutual fund shares, and CDs.

EAG employees attends educational conferences and events on topics that are relevant for the firm, and receive free publications (electronic and hard copy) of topical interest, from Fidelity and Schwab and from other publishers.

#### **Item 13 – Review of Accounts**

Velda Eugénias and the Portfolio Analyst review all client portfolios. Portfolios are reviewed at least annually and are looked at on a quarterly basis. All Clients are advised that it remains their responsibility to advise EAG of any changes in their investment objective and/or financial situation. Any perceived need for change is then considered for each client portfolio on an individual basis.

#### **Item 14 – Client Referrals and Other Compensation**

At the current time, EAG does not compensate anyone for referrals and does not accept any referral fees when referring a client to another advisor.

#### **Item 15 – Custody**

It is EAG's policy to not accept custody of a client's securities. In other words, EAG is not granted access to the clients' accounts which would enable EAG to withdraw or transfer or otherwise move funds or cash from any client account to EAG's accounts or the account of any third party (other than for purposes of fee deductions, as explained below). This is for the safety of the clients' assets.

However, with a client's consent, EAG is provided with the authority to seek deduction of EAG's fees from a client's accounts; this process generally is more efficient for both the client and the

investment adviser, and there may be tax benefits for the client to this method when fees can be paid from certain tax-deferred accounts of clients.

The account custodian does not verify the accuracy of EAG's advisory fee calculation.

Account custodians are responsible for providing account statements, no less than quarterly, which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide confirmation of all trading activity, and year-end tax statements, such as 1099 forms. If you are not receiving at least quarterly custodial account statements, please contact us at the number on the cover page of this brochure. EAG urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

EAG typically receives discretionary authority from the client at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. Prior to EAG assuming discretionary authority over a client's account, the client shall be required to execute a *Client Advisory Agreement*, granting EAG full authority to buy, sell, or otherwise effect investment transactions. In addition, any investment discretion is obtained in writing through a limited power of attorney signed by the client prior to any investment execution. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

If accounts are held in Qualified Retirement accounts or any non-Schwab or non-Fidelity custodial account, EAG will need Advisor authorization for login with that custodian. If the custodian does not offer that option then Client will work with ByAllAccounts to establish a login for downloads of those assets into Morningstar for account performance reporting and invoicing. With the Client working directly with ByAllAccounts, EAG never has access to the password or access to the clients' money. If EAG doesn't have access to their clients' account online via an advisor login then client will be given the trade suggestions for handling the trading implementation. Investment guidelines and restrictions must be provided to EAG in writing.

Clients who engage EAG on a discretionary basis may, at any time, impose restrictions, in writing, on EAG's discretionary authority (i.e. limit the types/amounts of particular securities purchase for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe EAG's use of margin, etc.).

### **Item 17 – Voting Client Securities**

Notwithstanding EAG's discretionary authority to make investment decisions on behalf of Client, EAG will **not exercise proxy voting authority over Client securities**. The obligation to vote Client proxies shall at all times rest with the Client. Client shall in no way be precluded from contacting EAG for advice or information about a particular proxy vote. However, EAG shall not be deemed to have proxy voting authority solely as a result of providing such advice to Client. Should EAG inadvertently receive proxy information for a security held in Client's account, then EAG will immediately forward such information on to Client, but will not take any further action with respect

to the voting of such proxy. If the Client is subject to ERISA, the plan sponsor or employer plan fiduciary is responsible for the voting of proxies. EAG will not vote proxies. Upon termination of its Agreement with Client, EAG shall make a good faith and reasonable attempt to forward proxy information inadvertently received by EAG. Any information received by EAG which relates to the voting of Client's proxies shall be maintained by EAG for a period of five years from the date of receipt, the first two years in the offices of EAG.

#### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about EAG's financial condition. EAG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

**Brochure Supplement (Part 2B of Form ADV) begins on next page**



## **Private Wealth Management**

### **Brochure Supplement**

(ADV Part 2B)

March 1, 2019

#### **Supervised Persons**

Velda A. Eugenias

508 South Fifth Street, Gadsden, AL 35901

256.546.3243

**[www.EAGWealth.com](http://www.EAGWealth.com)**

This Brochure Supplement provides information about Velda A. Eugenias that supplements the Eugenias Advisory Group, LLC's brochure (ADV Part 2A). You should have received a copy of this brochure. Please contact Velda Eugenias at 256.546.3243 if you did not receive the ADV Part 2A or if you have any questions about the contents of this supplement.

Additional information about Velda A. Eugenias is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Ms. Eugenias' CRD number is 2290078.

## **Item 2 - Education Background and Business Experience**

EAG requires any associated person involved in determining or giving investment advice to have applicable experience. A college degree, preferably in a related field is preferred but may not be required. Additionally, associated persons will be required to hold any licenses that may be required by a regulatory agency.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes multiple-choice questions, including stand-alone questions and sets of questions associated with short scenarios or more lengthy case histories;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Velda Eugenias is a NAPFA-Registered Financial Advisor® which is the top level of membership in the National Association of Personal Financial Advisors (NAPFA). All NAPFA-Registered Financial Advisors® must have three years of comprehensive financial planning experience, have a sample comprehensive financial plan pass a peer review process. Currently all newly appointed NAPFA-Registered Financial Advisors® must possess a Bachelor's degree from an accredited institution. Currently new NAPFA-Registered Financial Advisors® must also possess the Certified Financial Planner™ designation awarded by the Certified Financial Planner Board of Standards, Inc. All NAPFA-Registered Financial Advisors® must also adhere to NAPFA's Fiduciary Oath, Standards of Membership and Affiliation, and Bylaws. NAPFA-Registered Financial Advisors must also comply with NAPFA's strict continuing education requirements of sixty hours every two years. All NAPFA-Registered Financial Advisors® provide investment and/or financial advice on a strictly Fee-Only basis as defined by NAPFA, and continue to meet NAPFA's standards for strong character and adherence to the laws and regulation governing the profession.

**Velda A. Eugenias - Year of Birth 1949**

Education:

The College for Financial Planning, Denver Colorado, 1999

University of Alabama, Bachelors of Science, Financial Planning & Counseling, 2004

Examinations/Associations:

Certified Financial Planner (CFP®) May, 2000

NAPFA Registered Financial Advisor® January 2004

Life Underwriters Training Council (LUTC) 1993

Life Insurance License, State of Alabama from 1992-2003

NASD tests taken and previously held: Series 6, 63, and 7

Business Background:

Owner, Eugenias Advisory Group, LLC, January 2008 - Present

Co-Owner, Cedarholm & Eugenias, LLC, May 2003 - March 2008

Compass Bank - Vice President & Senior Investment Officer - 1994 - 2003

Metropolitan Life Insurance - Registered Representative - 1992 - 1994

Exchange Bank of Alabama - Assistant Vice President 1987 - 1992

**Item 3 - Disciplinary Information**

Ms. Eugenias does not have, nor has she ever had, any disciplinary disclosures.

**Item 4 - Other Business Activities**

Ms. Eugenias is not actively engaged in any investment-related business or occupation beyond her capacity as an advisory representative of Eugenias Advisory Group, LLC.

**Item 5 - Additional Compensation**

Ms. Eugenias does not receive any additional compensation or economic benefit beyond that received as a result of her capacity as Investment Adviser Representative of Eugenias Advisory Group, LLC.

**Item 6 - Supervision**

Velda Eugenias as the Managing Member, supervises her own work.



## **Private Wealth Management**

### **Brochure Supplement**

(ADV Part 2B)

March 1, 2019

#### **Supervised Persons**

Mauricio Cortes Resendiz

5123 Virginia Way

Brentwood, TN 37027

615.371.5222

**[www.EAGWealth.com](http://www.EAGWealth.com)**

This Brochure Supplement provides information about Mauricio Cortes Resendiz that supplements the Eugenias Advisory Group, LLC's brochure (ADV Part 2A). You should have received a copy of this brochure. Please contact Velda Eugenias at 256.546.3243 if you did not receive the ADV Part 2A or if you have any questions about the contents of this supplement.

Additional information about Mauricio Cortes Resendiz is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Cortes Resendiz' CRD number is 6307778.

## **Item 2 - Education Background and Business Experience**

EAG requires any associated person involved in determining or giving investment advice to have applicable experience. A college degree, preferably in a related field is preferred but may not be required. Additionally, associated persons will be required to hold any licenses that may be required by a regulatory agency.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes multiple-choice questions, including stand-alone questions and sets of questions associated with short scenarios or more lengthy case histories;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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**Mauricio Cortes Resendiz** - Year of Birth: 1990

Education:

- Vanderbilt University, Vanderbilt Business School, M.B.A., 2018.
- College for Financial Planning, CFP® Professional Education Program, 2015.
- Arizona State University, W.P. Carey School of Business, B.S., 2013.

Examinations/Associations:

- Certified Financial Planner (CFP®), August 2018
- NAPFA Registered Financial Advisor®, August 2018
- Financial Planning Association (FPA), November 2015

Business Background:

- Eugenias Advisory Group, LLC, Portfolio Analyst & Associate Planner, 2018 to present.
- Fish & Associates Financial Services, Summer Intern, 2017.
- The Vanguard Group, Portfolio Implementation Associate, 2015-2016.

- The Vanguard Group, Financial Processor, 2014-2015.
- General Motors Financial, Bilingual Customer Account Representative, 2013-2014.

### **Item 3 Disciplinary Information**

Mr. Cortes Resendiz does not have, nor has he ever had, any disciplinary disclosures.

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

Mr. Cortes Resendiz is not actively engaged in any investment-related business or occupation beyond his capacity as an advisory representative of Eugenias Advisory Group, LLC.

### **Item 5 Additional Compensation**

Mr. Cortes Resendiz does not receive any additional compensation or economic benefit beyond that received as a result of his capacity as Investment Adviser Representative of Eugenias Advisory Group, LLC.

### **Item 6 Supervision**

Velda Eugenias, Managing Member of Eugenias Advisory Group, LLC is responsible for supervising Mr. Cortes Resendiz' advisory activities. You may contact Ms. Eugenias at 256.546.3243.