

**Eaton-Cambridge Inc.**  
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**April 9, 2020**

**This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Eaton-Cambridge Inc. If you have any questions about the contents of this Disclosure Brochure, please contact us at (480) 385-7391 and/or [Bob@eatoncambridge.com](mailto:Bob@eatoncambridge.com). The information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority.**

**Additional information about Eaton-Cambridge Inc. (CRD# 116798) also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 116798.**

**Any references to Eaton-Cambridge Inc. as a registered investment advisor or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

**Eaton-Cambridge Inc.**  
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## Item 2 - Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Eaton-Cambridge. The Brochure Supplement is separate, but will typically be provided in connection with this Disclosure Brochure.

Eaton-Cambridge believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Eaton-Cambridge encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The material changes in this brochure from the last annual updating amendment of Eaton-Cambridge Inc. on 03/06/2019 are described below. Material changes relate to Eaton-Cambridge Inc.'s policies, practices or conflicts of interests.

- Eaton-Cambridge Inc. has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Eaton-Cambridge.

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](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 116798. You may also request a copy of this Disclosure Brochure at any time, by contacting Robert Korljan at (480) 385-7391 and/or [Bob@eatoncambridge.com](mailto:Bob@eatoncambridge.com).

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#### **Item 4 - Advisory Business**

Eaton-Cambridge Inc. (“Eaton-Cambridge” or the “Advisor”) is an investment advisory firm offering a variety of advisory services customized to your individual needs. The services are more fully described below.

Eaton-Cambridge Inc. was initially founded in 1998 under the business name Cambridge Wealth Management, Inc. In September 2012, Cambridge Wealth Management, Inc. changed its name to Eaton-Cambridge Inc. Eaton-Cambridge is owned by Robert Korljan (Founder, President and Wealth Management Advisor) and Marc Giannone (Partner, Wealth Management Advisor, and Chief Compliance Officer). Additional business information about Robert Korljan and Marc Giannone is disclosed in Item 19 and on their respective Form ADV2B (“Brochure Supplement”).

Eaton-Cambridge offers the following advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations and business entities (each a “Client” and also referred to as “you”). As previously stated, each of the services is more fully described below.

- Investment Management
- Analysis, Recommendation and Monitoring of Third Party Management Programs
- Planning, Advisory and Consultative Services

Eaton-Cambridge tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on investing in certain securities or types of securities in your “Accounts”.

You will begin your relationship with Eaton-Cambridge by participating in several meetings with an Advisory Representative of Eaton-Cambridge. You will be requested to bring to the meetings a list of information and documents, which will assist Eaton-Cambridge to assess your financial situation. You will be requested to provide items such as most recent account statements, bank statements, wills and trusts, insurance policies, tax return, pay stubs, and listing of assets and liabilities and cash flow. Typically, information and document requests are brought to the second meeting. Additionally, depending on the services you have requested, Eaton-Cambridge will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings tendencies
- Other applicable financial information required by Eaton-Cambridge in order to provide the investment advisory services requested.

Eaton-Cambridge does not manage a wrap-fee program (an advisory program that combines the fees for securities transactions with the investment advisory services into a single fee). However, certain Third-

Party Management Programs recommended by Eaton-Cambridge may have a wrap fee program structure. The Client is provided the relevant disclosure brochure for all managers and programs in advance of establishing these services.

Eaton-Cambridge manages approximately \$129,516,131.00 in discretionary assets as of December 2019. Additionally, Eaton-Cambridge has assets under advisement of \$37,467,948.00 that are placed with third party managers for asset management. Eaton-Cambridge does not have trading authority over the assets placed with third party managers but oversees the management of the assets and the suitability of the management program selected by the Client.

#### Investment Advisory Services

Upon Eaton-Cambridge completing its analysis of your situation, Eaton-Cambridge will determine an asset allocation customized to your financial goals, objectives and risk tolerance. Eaton-Cambridge uses a combination of its model portfolios and customizing the model portfolios to your specific situation to manage your account(s). After evaluating your information gathered by Eaton-Cambridge, Eaton-Cambridge will determine which of its model portfolios would be most suitable for you. From there, Eaton-Cambridge customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

Eaton-Cambridge will schedule a meeting with you and present the recommended portfolio allocation. Upon your approval, Eaton-Cambridge will implement the portfolio allocation. Eaton-Cambridge will provide continuous and ongoing management of your account(s). Unless otherwise expressly requested by you, Eaton-Cambridge will manage your account(s) on a discretionary basis. Therefore, Eaton-Cambridge will determine the securities to be purchased and sold in the account(s) and will alter the securities holdings from time to time, without prior consultation with you.

At least annually, your account(s) will be reviewed to determine any reallocation of your portfolio is necessary.

It is recommended you establish your account(s) with a broker/dealer/custodian ("Custodian") with whom Eaton-Cambridge has an institutional relationship in order to execute Client trades and grant trading authorization to Eaton-Cambridge. You are not obligated to use a Custodian suggested by Eaton-Cambridge. However, if you select another Custodian, Eaton-Cambridge's services may be limited depending on the ability of the custodian you have selected to accept instructions from Eaton-Cambridge and provide Eaton-Cambridge with transactional information.

Eaton-Cambridge will not maintain custody of your funds or securities, with the exception of deduction of Eaton-Cambridge's investment advisory fee from your account(s). Custodial services for your account(s) will be provided through the custodian you have selected.

Adviser primarily uses open-ended institutional mutual funds or no-load and load waived or mutual funds purchased at net asset value (NAV). However, managed accounts are not exclusively limited to mutual funds and may include stocks and bonds which are typically transferred or requested by you and exchange traded funds (ETFs).

You are advised transactions in the account(s), account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

### Planning and Consulting Services

Eaton-Cambridge offers the following advisory services:

#### *Financial Planning Services*

Eaton-Cambridge will analyze your current situation and provide an analysis and action plan to work toward your financial goals.

Eaton-Cambridge will schedule a meeting with you and present the analysis of your situation and recommendations for steps to be taken to assist you to work toward financial goals.

Advisory services are based on your financial situation at the time and are based on financial information disclosed by you to Eaton-Cambridge. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Eaton-Cambridge cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the analysis and recommendations and update the analysis and recommendations based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify Eaton-Cambridge promptly of the changes. You are advised that the advice offered by Eaton-Cambridge may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### General Information

You are advised the investment recommendations and advice offered by Eaton-Cambridge are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform Eaton-Cambridge promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify Eaton-Cambridge of any such changes could result in investment recommendations not meeting your needs.

### Third Party Management Programs

Eaton-Cambridge has entered into a relationship with third party management programs for the purposes of offering Clients access to their investments and platforms. Eaton-Cambridge offers access to the following third party management programs:

- Matson Money, Inc.
- Loring Ward – limited to retirement accounts
- Financial Engines Advisors LLC

Clients will be provided with the third party management program's Form ADV2A ("Disclosure Brochure") and/or Wrap Fee Program Brochure, as applicable. The Client will then enter into an agreement with the third-party management program for investment management services.

Eaton-Cambridge will assist you with evaluating your suitability for one or more of the third party management programs offered through Eaton-Cambridge. Eaton-Cambridge will further assist you with selecting an appropriate and suitable portfolio and with establishing your account(s) through the selected program(s). Additionally, Eaton-Cambridge will contact you at least annually to review your account(s), financial situation and investment objectives and determine if any changes are needed to the portfolio. Eaton-Cambridge will communicate any changes discussed with you to the third party management program(s).

Eaton-Cambridge will not directly conduct any securities transactions on your behalf or participate directly in the selection of the securities to be purchased or sold in those accounts under management with a third party manager. Investment decisions are made by a third party manager you have selected and in accordance with the agreement between you and the third party management program.

#### Pension Plan Services

Eaton-Cambridge provides 3(21) consulting services to pension plans. Services include platform investment reviews and recommendations. Plan cost reviews. Assistance with employee education and participation.

#### Additional Disclosure Specific to Loring Ward

Eaton-Cambridge retains an independent third-party account administrator (Loring Ward) that performs certain services such as account administration, portfolio allocation analysis, asset-class investment strategy, back-office fulfillment, report and statement production, and fee debiting. Such services are paid directly through advisory fees billed to the Client or are indirectly paid by Eaton- Cambridge. Loring Ward is an investment adviser registered with the U.S. Securities and Exchange Commission ("SEC").

Eaton-Cambridge may recommend, where appropriate, that Client invest in shares of the SA Funds – Investment Trust (the "SA Funds"), a family of nine asset class mutual funds advised, managed and administrated by Loring Ward. Fees are not charged directly upon investments in the SA Funds. Loring Ward receives certain fees and expenses directly from the SA Funds for its services as disclosed in that Fund's prospectus.

#### Educational Workshops and Seminars

Eaton-Cambridge hosts educational workshops and seminars about a variety of financial related topics. The workshops or seminars are not designed to provide specific and personal advice to a specific Client. Instead, as referenced by the title, the workshops or seminars are educational in nature.

### **Item 5 - Fees and Compensation**

#### Investment Advisory Services

Investment advisory fees will be charged in advance, on a calendar quarterly basis, based upon the value of your portfolio on the last business day of the just completed calendar quarter. Accounts managed for a part of the quarter will be charged a prorated portion of the investment advisory fees for the quarter. Therefore, account(s) opened during the quarter will be initially charged a pro-rated portion of the investment advisory fee. Accounts closed during the quarter will be issued a pro-rated refund of the prepaid investment advisory fee.

Fees will not be adjusted for additional assets deposited into the account(s) after it is opened or for partial

withdrawals from the account(s) during a calendar quarter. No fee adjustments will be made for appreciation or depreciation in your account(s).

The investment advisory fees payable upon initial implementation of the account(s) may be paid by you upon receipt of the invoice from Eaton-Cambridge or collected directly from the account(s) you have designated. You will provide authorization to Eaton-Cambridge to withdraw its advisory fees in the investment advisory agreement you will execute with Eaton-Cambridge. Investment advisory fees for all subsequent periods will be charged to and collected directly from your account(s). You will be provided with a fee invoice from Eaton-Cambridge that identifies the investment advisory fee, the value of the account(s) and how the fee was calculated. Additionally, you will be provided with an account statement reflecting the deduction of the investment advisory fee by your custodian. If the account(s) does not contain sufficient funds to pay investment advisory fees, Eaton-Cambridge has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account(s) for investment advisory fees paid to Eaton-Cambridge, except for ERISA and IRA accounts.

The investment advisory fee schedule is progressive. Therefore, you will pay a fee at each asset level. For example, if you and your spouse have 3 accounts valued at \$500,000, \$500,000 and \$3,000,000 with a total combined value of \$4,000,000, your fee will be calculated as follows:

$$\begin{array}{rclcl}
 \$500,000 & \times & 1.20\% & = & \$6,000 \\
 \$500,000 & \times & 1.00\% & = & \$5,000 \\
 \underline{\$3,000,000} & \times & 0.70\% & = & \underline{\$21,000} \\
 \$4,000,000 & & & & \$32,000 \text{ annually} \\
 \text{Quarterly fee:} & & & & \\
 \$32,000 / 4 & = & \$8,000
 \end{array}$$

Account Size	*Maximum Annual Fee (%)
First \$500,000	1.20%
Next \$500,000	1.00%
Next \$3,000,000	0.70%
Over \$4,000,000	0.50%

\*Minimum annual fee of \$2400 or \$200 a month.

The fee schedule above will be assessed based on an aggregate value of your managed accounts. Fees are negotiable at the sole discretion of the Advisor. Your fees will be dependent on several factors including time spent with Eaton-Cambridge, number of meetings, complexity of your situation, amount of research, services requested, staff resources, investment assets and non-investment income. Eaton-Cambridge may change the above fee schedule upon 30-days prior written notice to you. In such instances, the Client and Eaton-Cambridge will first enter into a new investment advisory agreement validating the new fee schedule. Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of a Client's account(s).

**Notice to California Clients:** The Client may be able to attain similar services for a lower fee from other service providers (required disclosure under Rule 260.238(j)).

Robert Korljan is also a certified public accountant and separately offers tax services as further described under Item 10, Other Financial Industry Activities and Affiliations. Robert Korljan may agree for Clients with assets under management of at least \$1,000,000 to provide tax preparation services for simple tax returns (i.e. no itemized deductions or Schedule C) at no additional charge. The provision of tax preparation

services is subject to negotiation and exceptions to the provision of tax preparation may be made at the discretion of Robert Korljan.

#### Other Fees and Expenses

In addition to the investment advisory fees above, you will pay transaction fees for securities transactions executed in your account(s) in accordance with the custodian's transaction fee schedule. Additionally, you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by Eaton-Cambridge and are charged by the product, broker/dealer or account custodian. Eaton-Cambridge does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such fees are not shared with Eaton-Cambridge and are compensation to the fund manager. You should read the mutual fund prospectus prior to investing. The Client should review both the fees charged by the fund(s) and the fees charged by Eaton-Cambridge to fully understand the total fees to be paid.

#### Termination Provisions – Investment Advisory Services

You may terminate investment advisory services obtained from Eaton-Cambridge, without penalty, upon written notice within five (5) business days after entering into the investment advisory agreement with Eaton-Cambridge. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the account(s) such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, either party may terminate investment advisory services upon Eaton-Cambridge's receipt of either parties' written notice to terminate the agreement. Should you terminate investment advisory services during a calendar quarter, you will be issued a pro-rated refund of the investment advisory fee from the date of termination to the end of the calendar quarter.

#### Planning and Consulting Services

Fees for planning and consulting services are as follows:

<b>Fee Type</b>	<b>Maximum Fee</b>	<b>Payable</b>
Financial Planning Fees	\$2,500 to \$30,000	The entire fee is due upon execution of the Agreement between the Client and Eaton-Cambridge. Services will be completed within six (6) months.
Hourly Fee	\$350 per hour	Payable the sooner of completion of the services or at the end of each month based upon time spent by Eaton-Cambridge.

#### Termination Provisions – Planning and Consulting Services

You may terminate planning and consulting services obtained from Eaton-Cambridge, without penalty, upon written notice within five (5) business days after entering into the planning or consulting agreement with Eaton-Cambridge. Thereafter, either party may terminate advisory services by providing the other party written notice of the request to cease and terminate services. You will be responsible for any time spent by Eaton-Cambridge. Any refunds due to you will be calculated based on time Eaton-Cambridge has invested on your situation and services provided.

Services will terminate upon presentation of the analysis and recommendations, unless you elect to renew the annual retainer. Annual retainers terminate upon your written notice to terminate or failure to pay the renewal fee.

### Third Party Management Programs

Eaton-Cambridge also participates in third party management programs and may recommend such programs to Clients. Eaton-Cambridge participates in the management programs offered by Financial Engines Advisors LLC and Matson Money, Inc.

**Financial Engines Advisors LLC** - Eaton-Cambridge will receive a portion of the fee Financial Engines Advisors LLC charges the Client. In this arrangement, Eaton-Cambridge does not separately calculate and deduct its investment advisory fee. Financial Engines Advisors LLC, under separate contract with the Client, is authorized to deduct both the Financial Engines Advisors LLC and Eaton-Cambridge fees and remit the applicable portion to Eaton-Cambridge.

**Matson Money, Inc.** - Matson Money, Inc. (“Matson”) does not charge a separate investment advisory fee. Matson provides various mutual funds, which invest in other low-cost, diversified mutual funds in a “fund of funds” structure. Matson earns management fees from these funds, but does not charge a separate advisory fee to the Client’s account. Matson is authorized, under separate contract with the Client, is authorized to deduct the Eaton-Cambridge fees and remit those fees to Eaton-Cambridge.

In this arrangement, Eaton-Cambridge does not separately calculate and deduct its investment advisory fee. Matson, under separate contract with the Client, is authorized to deduct the Eaton-Cambridge fee and remit those fees to Eaton-Cambridge.

A conflict of interest may exist for Eaton-Cambridge to recommend the services of a third party management program. You are further advised that the advisory fees or mutual funds costs for Financial Engines Advisors LLC and Matson, respectively, may be higher or lower than if you directly obtained their services without Eaton-Cambridge’s assistance. Furthermore, the Matson program may not be available without referral from a registered investment advisor. However, you would not have the benefit of the oversight, consulting or monitoring services offered by Eaton-Cambridge. The advisory fees or mutual fund fees earned by Financial Engines Advisors LLC and Matson, respectively, may be higher or lower than the fees charged by other third party managers offering similar services. It is important you read the Financial Engines Advisors LLC or Matson Disclosure Brochures and the applicable prospectuses for details about their management programs including fees and conflicts of interest.

### Matson Money, Inc.

Fees are calculated and deducted by Matson directly from the Client’s account(s) quarterly in advance of each calendar quarter.

<b>Account Size</b>	<b>Maximum Annual Fee to Advisor*</b>
First \$500,000	1.20%
Next \$500,000	1.00%
Next \$3,000,000	0.70%
Over \$4,000,000	0.50%

\* Eaton-Cambridge fee. Matson is compensated through management fees in the underlying mutual funds.

The determination of the fee schedule is subject to the discretion of Robert Korljan.

### Loring Ward

<b>Account Size</b>	<b>Maximum Annual Fee to Advisor*</b>
Up to \$999,999	0.50%
\$1,000,000 to \$2,999,999	0.50%
\$3,000,000 to \$4,999,999	0.50%
\$5,000,000 and above	0.30%

\* Loring Ward fees are in addition to these fees.

### Financial Engines Advisors LLC

Eaton-Cambridge's portion of Financial Engines Advisors LLC's fee is based on the fee schedule below.

<b>Account Size</b>	<b>Maximum Annual Fee to Advisor*</b>
First \$400,000	1.05%
Next \$350,000	0.75%
Next \$250,000	0.50%
Next \$2 million	0.35%
Next \$7 million	0.25%
Next \$15 million	0.20%
Above \$25 million	Negotiable

\* Eaton-Cambridge fees. Financial Engines Advisors LLC fees are in addition to these fees.

Please refer to the third party manager's Disclosure Brochure and your agreement with the third party manager for details on fee calculation and payment.

### Educational Workshops and Seminars

Eaton-Cambridge may elect to charge a fee per person or couple to attend a seminar. Notice of the fee will be posted in the seminar invitation. Fees will not exceed \$50 per person.

Note to California Clients: The Client may be able to attain similar services for a lower fee from other service providers (required disclosure under Rule 260.238(j)).

Eaton-Cambridge does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

This section is not applicable to Eaton-Cambridge since Eaton-Cambridge does not charge performance-based fees.

### **Item 7 - Types of Clients**

Eaton-Cambridge's services are geared toward individuals both high net worth (i.e. Clients with a net worth of \$1,500,000) and other than high net worth, trusts, estates and charitable organizations and corporations or other business entities. Eaton-Cambridge services may require a minimum fee as noted above in Item 5.

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

Eaton-Cambridge's investment philosophy is based on the academic findings of Markowitz, Fama, and French. Eaton-Cambridge's management is heavily based on Modern Portfolio Theory and the Efficient Market Hypothesis. Modern portfolio theory (MPT) is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. MPT is a mathematical formulation of the concept of diversification in investing, with the aim of selecting a collection of investment assets that has collectively lower risk than any individual asset. The efficient-market hypothesis (EMH) asserts that financial markets are "informationally efficient". That is, one cannot consistently achieve returns in excess of average market returns on a risk-adjusted basis, given the information publicly available at the time the investment is made. There are three major versions of the hypothesis: "weak", "semi-strong", and "strong". Weak EMH claims that prices on traded assets (e.g., stocks, bonds, or property) already reflect all past publicly available information. Semi-strong EMH claims both that prices reflect all publicly available information and that prices instantly change to reflect new public information. Strong EMH additionally claims that prices instantly reflect even hidden or "insider" information. There is evidence for and against the weak and semi-strong EMHs, while there is powerful evidence against strong EMH. The validity of the hypothesis has been questioned by critics who blame the belief in rational markets for much of the financial crisis of 2007–2010. Defenders of the EMH caution that conflating market stability with the EMH is unwarranted; when publicly available information is unstable, the market can be just as unstable.

Eaton-Cambridge does not represent, warrant or imply that the services or methods of analysis used by Eaton-Cambridge can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Eaton-Cambridge will provide a better return than other investment strategies.

As stated above, Eaton-Cambridge primarily uses institutional mutual funds, when available. The risks with mutual funds include the costs and expenses within the fund that can impact performance and change of managers. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day.

**Margin Borrowing**

Eaton-Cambridge may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by Eaton-Cambridge will require you to prepare to bear the risk of loss and fluctuating performance.

**Item 9 - Disciplinary Information**

There is no reportable disciplinary information required for Eaton-Cambridge or its Supervised Persons that is material to your evaluation of Eaton-Cambridge, its business or its management persons. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 116798.

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

### Accounting Affiliations

Robert Korljan is the President of Eaton-Cambridge CPA PC, an accounting firm, providing accounting services and tax preparation. Eaton-Cambridge may recommend you seek the assistance of accounting services or an accountant. You are not obligated to participate in accounting services through Eaton-Cambridge CPA PC, or Cambridge Tax Advisory, LLC. Should you elect to participate in accounting services through Mr. Korljan, Eaton-Cambridge CPA PC, clients may be charged a separate fee for such services. Such compensation will be in addition to any fees paid by you to Eaton-Cambridge for advisory services.

### Relationship with Third Party Management Programs

As previously stated, Eaton-Cambridge has entered into a relationship with certain third party management programs (See Item 4). When utilizing a third-party manager or management program, the program will typically deduct an overall advisory and platform fee that includes the Eaton-Cambridge investment advisory fee (as detailed in Item 5). In this instance, Eaton-Cambridge does not separately charge an investment advisory fee. Eaton-Cambridge will ensure that the other advisors they select are properly licensed and registered as investment advisor representatives.

### Insurance Agency Affiliations

Certain Advisory Persons of Eaton-Cambridge also serve as licensed insurance and benefits professionals. Implementations of insurance and benefit recommendations are separate and apart from an Advisory Person's role with Eaton-Cambridge. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular investment advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Eaton-Cambridge or its Advisory Persons.

### Financial Registration and Affiliations

Neither Eaton-Cambridge nor any of its Supervised Persons have any registrations or affiliations with a broker-dealer, futures commission merchant, commodity pool operator, or commodity-trading advisor.

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

Eaton-Cambridge and its Supervised Persons may buy or sell securities identical to those securities recommended to you. Therefore, Eaton-Cambridge and/or its Supervised Persons may have an interest or position in certain securities that are also recommended and bought or sold to you. Eaton-Cambridge and its Supervised Persons will not put their interests before your interest. Eaton-Cambridge and its Supervised Persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other Clients.

Eaton-Cambridge is required to maintain a list of all securities holdings for its Supervised Persons and develop procedures to supervise the trading activities of Supervised Persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, Supervised Persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. Eaton-Cambridge and its Supervised Persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

### Code Of Ethics

Eaton-Cambridge has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Eaton-Cambridge takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as Eaton-Cambridge's policies and procedures. Further, Eaton-Cambridge strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with Eaton-Cambridge's Privacy Policy. As such, Eaton-Cambridge maintains a code of ethics for its Supervised Persons,. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, Eaton-Cambridge's Code of Ethics establishes the Advisors' expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Eaton-Cambridge allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Eaton-Cambridge does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Eaton-Cambridge does not have a material interest in any securities traded in Client accounts. While Eaton-Cambridge allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, at no time will Eaton-Cambridge, or any Supervised Person of Eaton-Cambridge, transact in any security to the detriment of any Client.

Notice to California Clients: Eaton-Cambridge represents that all material conflicts of interest that could affect the judgment or ability to provide unbiased advice by the Advisor or its Supervised Persons pursuant to CCR Section 260.238(k) have been disclosed.

### **Item 12 - Brokerage Practices**

Eaton-Cambridge will recommend custodians/broker-dealers based on our duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and we may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in our research efforts. We will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian. We recommend TD Ameritrade, Inc. ("TD Ameritrade") as broker/custodian. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and FINRA member.

1. Soft Dollars – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. While Eaton-Cambridge does not have any formal soft dollar arrangements, we participate in the TD Ameritrade Institutional program. TD Ameritrade offers services to independent investment advisors which include custody of securities, trade execution, clearance and settlement of transactions. Eaton-Cambridge receives some benefits from TD Ameritrade through its participation in the program, although it is not deemed soft dollar benefits.

You are not obligated to utilize the services of TD Ameritrade. However, any firm you select for custody and brokerage services must be able to provide Eaton-Cambridge promptly with statements, provide electronic access for trading and viewing of your account(s) and readily accept trade instructions issued on your behalf by Eaton-Cambridge. If the firm you select is not able to accommodate the aforementioned,

Eaton-Cambridge's services will be limited to advisory and consultation since Eaton-Cambridge's management capabilities will be limited.

Eaton-Cambridge participates in TD Ameritrade's institutional customer program and Eaton-Cambridge may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between Eaton-Cambridge's participation in the program and the investment advice it gives to you. However, Eaton-Cambridge receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount):

- Receipt of duplicate Client statements and confirmations; research related products and tools; consulting services;
- Access to a trading desk serving adviser participants;
- Access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts);
- Ability to have advisory fees deducted directly from your managed accounts;
- Access to an electronic communications network for order entry and account information;
- Access to mutual funds with no transaction fees and to certain institutional money managers; and
- Discounts on compliance, marketing, research, technology, and practice management products or services provided to Eaton-Cambridge by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by Eaton-Cambridge's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Eaton-Cambridge but may not benefit its Client accounts. These products or services may assist Eaton-Cambridge in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Eaton-Cambridge manage and further develop its business enterprise. The benefits received by Eaton-Cambridge or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, Eaton-Cambridge endeavors at all times to put your interests first. You should be aware, however, that the receipt of economic benefits by Eaton-Cambridge or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Eaton-Cambridge's choice of TD Ameritrade for custody and brokerage services. As previously stated, you maintain the ability to select the Custodian for custody and brokerage services.

You are advised there is an incentive for Eaton-Cambridge to recommend a broker-dealer/custodian over another based on the products and services that will be received rather than your best interest.

2. Brokerage Referrals - Eaton-Cambridge does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Eaton-Cambridge will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Eaton-Cambridge will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### **Item 13 - Review of Accounts**

#### Asset Management Programs

Eaton-Cambridge elects Robert Korljan, Marc Giannone, Damian Goodhand, or Michael Simone to review Client portfolio and your financial situation at least annually or as otherwise agreed by you. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Eaton-Cambridge will monitor for changes in the Client's risk tolerance, objectives, time horizon and other Client suitability factors. Further, changes to your financial situation may result in Eaton-Cambridge revising the portfolio allocation of your managed accounts.

You are advised that you must notify Eaton-Cambridge promptly of any changes to your financial goals, objectives or financial situation as such changes may require Eaton-Cambridge to review the portfolio allocation and make recommendations for changes.

You will be provided statements at least quarterly directly from the account custodian. Additionally, you will receive confirmations of all transactions occurring directly from the account custodian. Eaton-Cambridge does not on a regular basis provide reports on your managed accounts. However, during reviews, Eaton-Cambridge may provide you with various reports to demonstrate the results of your portfolio. You should compare any report provided by Eaton-Cambridge with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

#### Advisory Services

If you are participating in annual retainer services you will receive reviews based on the agreement between you and Eaton-Cambridge. Services are customized to your needs.

If you are not participating in annual retainer services, you will not receive regular reviews unless requested and scheduled by you. Eaton-Cambridge recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

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

Eaton-Cambridge does not directly or indirectly compensate any person who is not a supervised person of Eaton-Cambridge for referrals.

Loring Ward may also sponsor educational seminars for the benefit of Eaton-Cambridge and its Clients. Such educational seminars provide Eaton-Cambridge with access to information and ideas regarding practice development, Client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by Loring Ward.

Product vendors recommended by Eaton-Cambridge may provide monetary and non-monetary assistance with Client events, provide educational tools and resources. Eaton-Cambridge does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. Eaton-Cambridge's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and Eaton-Cambridge.

Eaton-Cambridge does not engage paid solicitors for Client referrals.

## **Item 15 - Custody**

Eaton-Cambridge does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Eaton-Cambridge to utilize the Custodian for the Client's security transactions. In connection with the deduction of the Advisor's fee, Eaton-Cambridge will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. Eaton-Cambridge encourages Clients to review statements provided by the account Custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

## **Item 16 - Investment Discretion**

Eaton-Cambridge shall manage your account(s) on a discretionary basis. You will grant such authority to Eaton-Cambridge by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice to Eaton-Cambridge.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account(s) should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) With the exception of deduction of Eaton-Cambridge's advisory fees from the account, if you have authorized automatic deductions, Eaton-Cambridge will not have the ability to withdraw your funds or securities from the account.

In addition, third party management programs will require the Client to provide investment discretion for their accounts with the respective manager(s). Investment discretion is authorized under separate agreements with the third party managers.

## **Item 17 - Voting Client Securities**

Eaton-Cambridge does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 - Financial Information**

Neither Eaton-Cambridge, nor its owner has any adverse financial situations that would reasonably impair the ability of Eaton-Cambridge to meet all obligations to its Clients. Eaton-Cambridge is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

**Robert R. Korljan,  
CPA/PFS,  
Eaton-Cambridge Inc.  
5090 N. 40th Street Suite 205  
Phoenix, AZ 85018  
P: 480-385-7391  
(CRD# 2313014)  
[www.EatonCambridge.com](http://www.EatonCambridge.com)**

**This Form ADV2B (“Brochure Supplement”) provides information about Robert R. Korljan that supplements the Eaton-Cambridge Inc. Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact Marc T. Giannone, Partner and Chief Compliance Officer, if you did not receive Eaton-Cambridge Inc.’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Robert R. Korljan is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Robert R. Korljan, CPA/PFS

### Item 2 - Educational Background and Business Experience

*Year of Birth:* 1952

#### *Education:*

Name of School	Year Graduated	Degree	Major
Arizona State University	1974	BS	Accounting
Covenant Theological Seminary M. Div	1984	M. Div	Theology

#### *Professional Designations:*

- Certified Public Accountant (CPA) – 1975

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members<sup>3</sup> are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain Client consent if a conflict exists), maintain Client confidentiality, disclose to the Client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

- Personal Financial Specialist (PFS) – 1995

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's *Code of Professional Conduct*, and is encouraged to follow AICPA's *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the [AICPA](#).

<sup>5</sup> This description represents the requirements as of 1/1/2011. It is the responsibility of the adviser to disclose the qualifications in place when he or she attained the credential.

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Eaton-Cambridge Inc.	Advisory and Financial Planning	Founder, President	1999 to Present
Eaton-CambridgeCPA PC	Accounting Firm	President and Accountant	10/2017 to Present
Johnson Wealth Management, LLC	Advisory and Financial Planning	Wealth Manager, Partner	02/2020 tp Present
Corporate Benefit Services, Inc.	Payroll Services and Insurance	President	07/2002 to Present
The Bridge Tax Advisory, LLC	Tax Consulting	Member	06/2016 to 12/2016
Cambridge Tax Advisory, LLC	Tax Consulting	Member	10/2004 to Present
Roosevelt Community Church	Church	Pastor	06/2003 to Present
Robert Korljan, LTD	Accounting Firm	President, CPA	1992 to 04/2017

**Item 3 - Disciplinary Information**

Robert Korljan is not subject to legal or disciplinary events that are material to a Client or prospective client's evaluation of him or the services offered by him.

**Item 4 - Other Business Activities**

Accounting Firm

Robert Korljan is the President of Eaton-CambridgeCPA PC, an accounting firm, providing accounting services and tax preparation. Additionally, Robert Korljan offers tax-consulting services through Cambridge Tax Advisory, LLC. The services of Cambridge Tax Advisory, LLC are not offered to clients of Eaton-Cambridge, Inc. Eaton-Cambridge may recommend you seek the assistance of accounting services or an accountant. You are not obligated to participate in accounting services through Mr. Korljan, Eaton-CambridgeCPA PC. Should you elect to participate in accounting services through Mr. Korljan, Eaton-CambridgeCPA PC, clients may be charged a separate fee for such services. Such compensation will be in addition to any fees paid by you to Eaton- Cambridge for advisory services.

Payroll Firm

Robert Korljan owns Corporate Benefit Services, Inc. is a company that offers payroll services to clients of the CPA firm. They prepare the quarterly payroll forms and year end W-2's.

Insurance Agency Affiliation

Mr. Korljan is also a licensed insurance professional in the State of Arizona. Mr. Korljan will obtain necessary licensing in other states, as applicable, prior to engaging in insurance business with a Client outside of Arizona. Implementation of insurance and benefit recommendations are separate and apart from Mr. Korljan's role with Eaton-Cambridge. As an insurance professional, Mr. Korljan may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular investment advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Eaton-Cambridge or Mr. Korljan.

### Real Estate Investments

Mr. Korljan also owns several investment properties throughout the Scottsdale, AZ area. Clients are not solicited to invest in these real estate holdings.

### Johnson Wealth Management, LLC

Mr. Korljan is a partner and financial advisor for Johnson Wealth Management, LLC.

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

Robert Korljan has additional business activities where compensation is received. These business activities are detailed above.

### **Item 6 - Supervision**

Supervision and oversight of the activities conducted through Eaton-Cambridge Inc. ("Eaton-Cambridge") is conducted by Marc Giannone Chief Compliance Officer of Eaton-Cambridge. Marc Giannone can be contacted at (480) 385-7392. Marc Giannone reviews all transactions conducted in Clients' accounts. Additionally, all account information required to establish an account for a Client must flow through Marc Giannone. Marc Giannone has procedures in place to be aware of any outside business activities engaged in by supervised persons of Eaton-Cambridge, oversee communications with the public, and review personal trading activities of supervised persons of Eaton-Cambridge as well as in any account(s) over which they have direct or indirect beneficial interest.

Additionally, Robert Korljan has implemented a structure so that his personal securities transactions are reviewed by Marc Giannone.

**BROCHURE SUPPLEMENT**

**Marc T. Giannone RICP, CFP**

**Eaton-Cambridge Inc.**

**5090 N. 40th Street Suite 205**

**Phoenix, AZ 85018**

**P: 480-385-7392**

**CRD# 5781192**

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

**This Form ADV2B (“Brochure Supplement”) provides information about Marc Giannone that supplements the Eaton-Cambridge Inc. Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact Marc T. Giannone, Partner and Chief Compliance Officer, if you did not receive Eaton-Cambridge Inc.’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Marc Giannone is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Marc T. Giannone

### *Educational Background and Business*

*Experience Year of Birth:* 1983

#### *Education:*

Name of School	Year Graduated	Degree	Major
Monroe Community College			Liberal Arts
Messiah College	2006	BS	Business Administration

#### *Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Eaton-Cambridge Inc.	Advisory and Financial Planning	Wealth Manager, Partner, Chief Compliance Officer	05/2012 to Present
Eaton-CambridgeCPA PC	Accounting Firm	Partner	01/2020 to Present
Johnson Wealth Management, LLC	Advisory and Financial Planning	Wealth Manager, Partner	02/2020 to Present
The Bridge Tax Group, LLC	Tax Consulting	Member	06/2016 to 12/2016
Merrill Lynch, Pierce, Fenner & Smith, Inc.	Broker/Dealer	Registered Representative	04/2010 to 05/2012

#### *Professional Designation*

##### **Retirement Income Certified Professional (RICP)**

A professional designation for experienced financial professionals who wish to become experts in retirement income planning. A Retirement Income Certified Professional helps retirees and near-retirees develop a plan for managing and using the assets they have accumulated for retirement in order to live within a realistic budget and not run out of money prematurely.

##### **CFP® - Certified Financial Planner**

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.

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 case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

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.

### **Item 3 - Disciplinary Information**

Marc Giannone is not subject to legal or disciplinary events that are material to a Client or prospective client’s evaluation of him or the services offered by him.

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

#### Insurance Agency Affiliation

Mr. Giannone is also a licensed insurance professional in the State of Arizona. Mr. Giannone will obtain necessary licensing in other states, as applicable, prior to engaging in insurance business with a Client outside of Arizona. Implementation of insurance and benefit recommendations are separate and apart from Mr. Giannone’s role with Eaton-Cambridge. As an insurance professional, Mr. Giannone may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular investment advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Eaton-Cambridge or Mr. Giannone.

#### Eaton-Cambridge CPA P.C.

Mr. Giannone is a partner of, and provides tax/charitable gift planning consulting services to Eaton-Cambridge CPA P.C.

#### Johnson Wealth Management, LLC

Mr. Giannone is a partner and financial advisor for Johnson Wealth Management LLC.

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

Mr. Giannone has additional business activities where compensation is received. These business activities are detailed above.

**Item 6 - Supervision**

Supervision and oversight of the activities conducted through Eaton-Cambridge Inc. is conducted by Marc Giannone, Partner and Chief Compliance Officer of Eaton-Cambridge. Marc Giannone reviews all transactions conducted in Clients' accounts. Additionally, all account information required to establish an account for a Client must flow through Marc Giannone. Marc Giannone has procedures in place to be aware of any outside business activities engaged in by Supervised Persons of Eaton-Cambridge Inc. dba Eaton-Cambridge, oversee communications with the public, and review personal trading activities of Supervised Persons of Eaton- Cambridge as well as in any account(s) over which they have direct or indirect beneficial interest. Robert Korljan, in turn, supervises Marc Giannone. Robert Korljan can be contacted at (480) 385-7391.

Additionally, Robert Korljan reviews the personal securities transactions of Marc Giannone.

**BROCHURE SUPPLEMENT**

**Michael T. Simone CFP<sup>®</sup>, EA, QPFC, AIF<sup>®</sup>**

**Eaton-Cambridge Inc.**

**744 S. Settlers Circle  
Warrington, PA 18976**

**Main Office**

**5090 N. 40th Street Suite 205**

**Phoenix, AZ 85018**

**P: 480-385-7393**

**CRD# 6190450**

**[WWW.EatonCambridge.com](http://WWW.EatonCambridge.com)**

**This Form ADV2B (“Brochure Supplement”) provides information about Michael Simone that supplements the Eaton-Cambridge Inc. Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact Marc T. Giannone, Partner and Chief Compliance Officer, if you did not receive Eaton- Cambridge Inc.’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Michael Simone is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Michael T. Simone, CFP®, QPFC, AIF®**

*Educational Background and Business Experience*

*Year of Birth: 1952*

*Education:*

Name of School	Year Graduated	Degree	Major
San Jose State University	1977	BA	Philosophy
Covenant Theological Seminary	1981	MDiv	Theology
University of Phoenix	2003	MBA	Accounting

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Eaton - Cambridge, Inc.	Advisory and Financial Planning	Retirement Specialist	5/2013 to Present
The Bridge Tax Group, LLC	Tax Consulting	Member	06/2016 to 12/2016
3Rs, LLC	Receivables Management for Business/Municipalities	Member	2/2011 to 04/2013
Joni and Friends International	501c3	Board Member	01/2013 to Present
Smith's Corner Condominium Associates	Homeowners Association	Volunteer Treasurer	07/2007 to Present

*Professional Designation*

**ACCREDITED INVESTMENT FIDUCIARY® (AIF®)**

The AIF® Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed - book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF® Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards - setting body of fi360.”

**Enrolled Agent (EA)**

An enrolled agent (EA) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels—examination, collection, and appeals—of the Internal Revenue Service. In addition to taxpayer representation, enrolled agents often provide tax consultation services and prepare a wide range of federal and state tax returns.

**Qualified Plan Financial Consultant (QPFC)**

QPFC is the professional credential for financial professionals who sell, advise, market or support qualified retirement plans. The QPFC program provides an understanding of general retirement planning concepts, terminology, distinctive features of qualified plans and the role of retirement plan professionals. QPFC is not an entry-level credential. A candidate will be expected to demonstrate a general proficiency of plan administration, compliance, investment, fiduciary, and ethics issues.

### *Professional Designations:*

#### **CERTIFIED FINANCIAL PLANNER™, CFP®**

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, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- 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.

### **Item 3 - Disciplinary Information**

Michael Simone is not subject to legal or disciplinary events that are material to a Client or prospective client’s evaluation of him or the services offered by him.

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

#### Insurance Agency Affiliation

Mr. Simone is also a licensed insurance professional in the State of Pennsylvania. Implementation of insurance recommendations are separate and apart from Mr. Simone’s role with Eaton-Cambridge. As an insurance professional, Mr. Simone may receive customary commissions and other related revenues from the various

insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular investment advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Eaton-Cambridge or Mr. Simone.

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

Michael Simone has additional business activities where compensation is received. These business activities are detailed above.

#### **Item 6 - Supervision**

Supervision and oversight of the activities conducted through Eaton-Cambridge Inc. ("Eaton-Cambridge") is conducted by Marc Giannone, Partner and Chief Compliance Officer of Eaton-Cambridge. Marc Giannone can be contacted at (480) 385-7392. Marc Giannone reviews all transactions conducted in Clients' accounts. Additionally, all account information required to establish an account for a Client must flow through Marc Giannone. Marc Giannone has procedures in place to be aware of any outside business activities engaged in by Supervised Persons of Eaton-Cambridge, oversee communications with the public, and review personal trading activities of Supervised Persons of Eaton-Cambridge as well as in any account(s) over which they have direct or indirect beneficial interest.

**BROCHURE SUPPLEMENT**

**Gregory (“Damian”) D. Goodhand**

**Eaton-Cambridge Inc.**

**Main Office**

**5090 N. 40th Street Suite 205**

**Phoenix, AZ 85018**

**P: 480-385-7393**

**CRD# 6194646**

**[WWW.EatonCambridge.com](http://WWW.EatonCambridge.com)**

**This Form ADV2B (“Brochure Supplement”) provides information about Gregory (“Damian”) D. Goodhand that supplements the Eaton-Cambridge Inc. Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact Marc Giannone, Partner and Chief Compliance Officer, if you did not receive Eaton- Cambridge Inc.’s Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Damian Goodhand is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Gregory (“Damian”) D. Goodhand

### *Educational Background and Business*

*Experience Year of Birth:* 1981

#### *Education:*

Name of School	Year Graduated	Degree	Major
University of Arizona	2013	BS	Finance

#### *Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Eaton-Cambridge Inc.	Advisory and Financial Planning	Client Service Manager	08/2016 to Present
Charles Schwab	Advisory and Financial Planning	Client Service Associate	01/2015 to 08/2016
Home Depot	Home Goods	Delivery Will-Call Coordinator	04/2014 to 01/2015
Edward Jones	Advisory and Financial Planning	Branch Training Intern	06/2013 to 08/2013
The Home Depot	Home Goods	Garden Supervisor, InFocus Captain, Appliance Specialist, Hardware Associate	08/2007 to 04/2014

### **Item 3 - Disciplinary Information**

Gregory Goodhand is not subject to legal or disciplinary events that are material to a Client or prospective client’s evaluation of him or the services offered by him.

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

Mr. Goodhand is dedicated to the investment advisory activities of Eaton-Cambridge’s Clients. Mr. Goodhand does not have any other business activities.

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

Gregory Goodhand is dedicated to the investment advisory activities of Eaton-Cambridge’s Clients. Mr. Goodhand does not receive any additional forms of compensation.

### **Item 6 - Supervision**

Supervision and oversight of the activities conducted through Eaton-Cambridge is conducted by Marc Giannone, Partner and Chief Compliance Officer of Eaton-Cambridge. Marc Giannone can be contacted at (480) 385-7392. Marc Giannone reviews all transactions conducted in Clients’ accounts. Additionally, all account information required to establish an account for a Client must flow through Marc Giannone. Marc Giannone has procedures in place to be aware of any outside business activities engaged in by Supervised Persons of Eaton-Cambridge, oversee communications with the public, and review personal trading activities of Supervised Persons of Eaton-Cambridge as well as in any account(s) over which they have direct or indirect beneficial interest.