

**Item 1 – Cover Page**

**Eaton-Cambridge Inc.**

**Main Office**

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Phoenix, AZ 85018  
P: 480-385-7399**

**March 26, 2021**

**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) 385-7392 and/or [marc@eatoncambridge.com](mailto:marc@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.

We have updates to this Brochure that are limited to technical re-writes and/or updates of Items 4, 5, 8, 11, 12 and 17. We have made no material changes in the products and services that we offer, our investment advice and management processes, or the way that we manage our business.

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 our office at 480-385-7399.

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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).

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 Services
- Selection of Third-Party Money Managers, Platforms and Programs
- Financial Planning Services
- Advisory Services to Retirement Plans

#### **Investment Management Services**

Eaton-Cambridge provides investment management services to individuals, high net worth individuals, pension and profit-sharing plans, charitable organizations, corporations or other businesses that are tailored to meet the needs and investment objectives of the client. We offer discretionary portfolio management services. Subject to any written guidelines, which you may provide, you will grant us discretion and authority to manage your account. Accordingly, our firm is authorized to perform various functions, at your expense, without further approval from you. Such functions include the determination of securities to be purchased or sold and the amount of securities to be purchased or sold. We primarily recommend investment company securities (mutual funds). We also recommend exchange-traded funds ("ETFs") and individual stocks in limited circumstances. Once the portfolio is constructed, we provide continuous supervision and re-optimization of the portfolio as changes in market conditions and your circumstances may require. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing.

#### **Selection of Third-Party Money Managers, Platforms and Programs**

We have entered into agreements with various third-party investment advisers for the provision of certain investment advisory services. Factors considered in the selection of a third-party advisor include but may not be limited to: i) Our firm’s preference for a particular third-party advisor; ii) the client’s risk tolerance, goals and objectives, as well as investment experience; and, iii) the amount of client assets available for investment. In order to assist clients in the selection of a third-party advisor, we will typically gather information from you about your financial situation and investment objectives in regard to the management of the account.

The third-party advisor may customize your portfolio by blending traditional investment strategies with an allocation to asset classes. The investment strategy adopted by the third-party advisor could include value, growth, or contrarian investing styles. Generally, securities transactions will be decided upon and executed by the third-party advisor on a discretionary basis. This means that the manager selected will have the ability to buy and sell securities in your account without obtaining your approval. We will not manage or obtain discretionary authority over the assets in accounts participating in these programs. Generally, clients may

not impose restrictions on investing in certain securities or types of securities in accounts managed by a third-party advisor.

We will periodically review reports provided to the client. We will contact the client at least annually, or more often to review your financial situation and objectives, communicate information to the third-party advisor managing the account as necessary, and, to assist you in understanding and evaluating the services provided by the third-party advisor. Please notify us of any changes in your financial situation, investment objectives, or account restrictions.

A complete description of the services provided, the amount of total fees, the payment structure, termination provisions and other aspects of the third-party advisor's advisory business are detailed and disclosed in: i) the third-party advisor's Form ADV Part 2A; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager(s) selected; or, iv) the third-party advisor's account opening documents. A copy of all relevant disclosure documents of the third-party advisor and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

#### Financial Planning Services

We offer various financial planning related services, which assist our clients in the management of their financial resources. Financial planning services are based upon an analysis of your individual needs and begin with one or more information gathering consultations. Once we collect and analyse all documentation gathered during these consultations, we provide a written financial plan designed to achieve your financial goals and objectives. In this way, Eaton-Cambridge assists you in developing a strategy for the successful management of income, assets, and liabilities. In general, financial planning services may include any one or all of the following:

- Cash Flow Analysis – Assessment of your present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, pension plans, employee benefit statements, etc. The firm advises on ways to reduce risk, coordinate, and organize records, and estate information.
- Retirement Analysis – Identification of your long-term financial and personal goals and objectives including advice for accumulating wealth for retirement income or appropriate distribution of assets following retirement.
- Portfolio Analysis/Investment Planning – We provide investment alternatives, including asset allocation, and effect on your portfolio. We evaluate economic and tax characteristics of existing investments as well as their suitability for your objectives.
- Education Savings Analysis – Alternatives and strategies with respect to the complete or partial funding of college or other post-secondary education.
- Estate Analysis – We provide advice with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques.

The recommendations and solutions are designed to achieve your desired goals, subject to periodic evaluation of the financial plan, which may require revision to meet changing circumstances. Financial plans are based on your financial situation based on the information provided to the firm. We should be notified promptly of any change to your financial situation, goals, objectives, or needs.

You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our investment advisory services or by using the advisory

or brokerage provider of your choice.

#### Advisory Services to Retirement Plans

Eaton-Cambridge provides advisory services to qualified retirement plans. Our retirement plan services are designed to assist in the investment management process for employers. Eaton-Cambridge provides investment advisory services and assists plan fiduciaries with plan management. Pursuant to the terms of an agreement with the client, Eaton-Cambridge may serve as an ERISA Section 3(38) Investment Manager for investment selection, monitoring and construction of model investment portfolios. Eaton-Cambridge will also provide recommendations regarding the frequency of rebalancing of the plan participant portfolios. In providing such services, we generally use the same investment strategies and construct similar portfolios as those used with our individual investment management clients. Eaton-Cambridge's range of services includes:

- Investment selection, monitoring and model portfolio construction with rebalancing.
- Plan analysis to ensure the plan provisions align with the employer's goals and objectives.
- Employee education meetings, at least annually to educate participants regarding plan provisions, investment options, and the importance of planning for retirement.

In providing services to the Plan, our status is that of an investment adviser registered under the Investment Advisers Act of 1940, and we are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting either as a non-discretionary fiduciary of the Plan as defined in Section 3(21) under ERISA, or as a discretionary fiduciary of the plan as defined in Section 3(38) under ERISA.

Plan Participants who wish to engage our firm for individualized financial planning or consulting services outside the scope of the qualified plan may do so by executing a separate agreement, including separate fees and fee payment arrangements, with our firm.

#### Types of Investments

Eaton-Cambridge reserves the right to advise you on any other type of investment that it deems appropriate based upon your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of the advisory relationship or on any investment on which you request advice.

#### Assets Under Management

As of December 31, 2020, we manage \$132,025,270.00 in client assets on a discretionary basis, and \$0 in client assets on a non-discretionary basis. Additionally, Eaton-Cambridge has assets under advisement of \$35,022,662.00 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.

### **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). 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:

$$\begin{array}{rclcl} \$500,000 & \times & 1.50\% & = & \$7,500 \\ \$500,000 & \times & 1.00\% & = & \$5,000 \\ \underline{\$3,000,000} & \times & 0.70\% & = & \underline{\$21,000} \\ \$4,000,000 & & & & \$33,500 \text{ annually} \\ \text{Quarterly fee:} & & & & \end{array}$$

$$\$33,500 / 4 = \$8,375$$

Account Size	*Maximum Annual Fee (%)
First \$500,000	1.50%
Next \$500,000	1.00%
Next \$3,000,000	0.70%
Over \$4,000,000	0.50%

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 \$10,000	The entire fee is due upon execution of the Agreement between the Client and Eaton-Cambridge. Services will be completed within six (6) months.

#### 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.

#### Third Party Management Programs

We will share in the fee paid to the third-party advisor. The management fee is disclosed in the third-party advisor's disclosure documents. These fees may or may not be negotiable. Our compensation may differ depending upon our individual agreement with each third-party advisor. As such, we have an incentive to recommend one third-party advisor over another third-party advisor with whom we have a less favorable compensation arrangement or other advisory programs offered by third-party advisors with which we have



no compensation arrangements. Clients are not required to use the services of any third-party advisor recommended by us.

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

A conflict of interest exists 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 third party management may be higher or lower than if you directly obtained their services without Eaton-Cambridge's assistance. Furthermore, some programs 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 third party managers may be higher or lower than the fees charged by other third party managers offering similar services. It is important you read the respective Disclosure Brochures and the applicable prospectuses for details about their management programs including fees and conflicts of interest.

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.

#### **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.

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

##### Our Methods of Analysis and Investment Strategies

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.

For Investment Management clients, Eaton-Cambridge develops portfolios based on a long-term asset allocation strategy that is consistent with the client's investment objective and risk tolerance. Eaton-Cambridge typically uses academic-based research in analyzing passively managed mutual funds that it recommends to clients. Eaton-Cambridge's analyses includes a review of the fund's total operating expenses, portfolio turnover, investment objective, adherence to asset class performance, and investment restrictions and limitations. At present, Eaton-Cambridge typically recommends that clients invest in a diversified mix of no-load, passively managed, mutual funds that have low operating expenses, low portfolio turnover, below average capital gains distributions and a fundamental investment objective of investing primarily in a particular asset class. Eaton-Cambridge may recommend exchange-traded funds ("ETFs") at times for client portfolios to maintain market exposure while rebalancing the client's portfolio, and in limited circumstances to meet specific client needs, may also recommend other types of securities. Eaton-Cambridge receives no compensation or fees from any mutual fund. Eaton-Cambridge is not contractually or otherwise committed to use any mutual fund and may use other funds as it deems suitable and appropriate for its clients.

### ***Risk of Loss***

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

***Market Risk.*** Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value. The prices of securities held by mutual funds in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the mutual funds; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations.

***Management Risk.*** Eaton-Cambridge's investment approach may fail to produce the intended results. If Eaton-Cambridge's perception of the performance of a specific asset class or fund is not realized in the expected time frame, the overall performance of clients' portfolios may suffer.

***Equity Risk.*** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small-and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies. Investing in individual companies involves inherent risk. The major risks relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk, the company's ability to create shareholder value (i.e., increase the value of the company's stock price), exposure to government taxation, and domestic political risk.

### **Recommendation of Particular Types of Securities**

We primarily recommend mutual funds and on occasion exchange traded funds (ETFs). However, we may recommend other types of investments as appropriate for you since each client has different needs and different

tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into or sell out of the fund, other types of mutual funds do charge such fees, which can also reduce returns. Mutual funds can also be "closed end" or "open end." So-called "open end" mutual funds continue to allow in new investors indefinitely, which can dilute other investors' interests.

#### **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**

##### 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.

##### Accounting Affiliations

Robert Korljan is the President of Eaton-CambridgeCPA 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-CambridgeCPA PC, or Cambridge Tax Advisory, LLC. 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.

##### 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.

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

### 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.

### Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

### Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that Associated Persons shall not have priority over your account in the purchase or sale of securities.

## **Item 12 - Brokerage Practices**

We recommend the brokerage and custodial services of TD Ameritrade, Inc., a securities broker-dealer and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. We believe that TD Ameritrade, Inc. provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by TD Ameritrade, Inc., including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services TD Ameritrade, Inc. provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We will receive research products and services from TD Ameritrade, Inc. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize TD Ameritrade's Institutional Services platform, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular

transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

While we endeavor at all times to put your interest first as part of our fiduciary duty, you should be aware that the receipt of additional compensation itself creates a conflict of interest.

#### Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

#### Directed Brokerage

Generally, we require that you direct our firm to execute transactions through TD Ameritrade, Inc. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

#### Block Trades

Eaton-Cambridge generally implements its investment strategies through no-load mutual funds, which are purchased and sold for a transaction fee charged by the client's executing broker. Eaton-Cambridge does not aggregate client trades because the trades are executed for a flat fee per fund trade basis or flat AUM based fee and aggregating trades would not result in the reduction of such fees.

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

#### Asset Management Programs

Eaton-Cambridge elects Robert Korljan, Marc Giannone, or Damian Goodhand 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

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.

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**

##### Proxy Voting

We will not vote proxies. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

#### Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit. Moreover, we do not determine whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf. At your request, we may offer you advice regarding corporate actions.

#### **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 to 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** CFP®, RICP  
**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	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-CambridgeCPA P.C.

Mr. Giannone is a partner of, and provides tax/charitable gift planning consulting services to Eaton-CambridgeCPA 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**

**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	Director of Operations and Client Services, Investment Adviser Representative	08/2016 to Present
Johnson Wealth Management, LLC	Advisory and Financial Planning	Director of Operations and Client Services, Investment Adviser Representative	08/2020 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 a Director of Operations and Client Services, and an Investment Adviser Representative at Johnson Wealth Management, LLC.

### **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.