

## **Eagle Investors LLC**

**300 E Indiana 45/46 Bypass, Apt. 1,  
Bloomington, IN 47408**

**March 2023**

This “**Brochure**” provides information about the qualifications and business practices of Eagle Investors LLC (hereinafter “**Eagle Investors**,” “**we**,” “**us**,” “**our**” or the “**Firm**”). If you have any questions about the contents of this Brochure, please contact our Chief Compliance Officer (“**CCO**”), Viswanath Namburi, by email at [vishu@eagleinvestors.com](mailto:vishu@eagleinvestors.com). Information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (the “**SEC**”) or by any state securities authority.

Registration as an investment adviser does not imply that Eagle Investors or any of its principals or employees possesses a particular level of skill or training in the investment advisory business or any other business.

Additional information about Eagle Investors is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Material Changes**

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This Brochure is Eagle Investors LLC's annual amendment for the year ended 2022. There have been no material updates to this Brochure since its annual amendment in March 2022. Clients and prospective clients should carefully review the disclosures contained herein. #

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#### Item 4: Advisory Business

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Eagle Investors LLC (hereinafter “**Eagle Investors**,” “**we**,” “**us**,” “**our**” or the “**Firm**”) is organized as an Indiana limited liability company with a principal place of business in Bloomington, Indiana. Eagle Investors is principally owned by Ishaan Kumar Sandhir, Viswanath Namburi, Samuel Keoleian, and Pardhasaradhi Namburi.

Eagle Investors will provide investment research and financial advice regarding options and stock trading to fee-based Subscribers (“Subscribers”). The Firm does provide tailored investment advice to its Subscribers. Our investment advice guidelines are non-discretionary and available to our Subscribers via ongoing fee-based subscription.

We do not currently participate in any Wrap Fee Programs.

Currently, we do not have regulatory assets under management, and we do not expect to maintain client assets under management.

### **Item 5: Fees and Compensation**

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The fees applicable to Subscribers are set forth in detail in each membership agreement. A brief summary of such fees is provided below.

#### ***Management Fee***

Eagle Investors is paid a subscription fee ("Subscription Fees").

The Fee will range from \$37 monthly to \$297 monthly (not a % or for management but for the subscription).

The Investment Manager, in its sole discretion, may waive or modify the Subscription Fee for any Subscriber.

#### ***Other Types of Fees or Expenses***

The Firm is responsible for and shall pay, or cause to be paid, all of their own ordinary administrative and overhead expenses, including, without limitation, all costs and expenses related to rent, furniture, fixtures, equipment, office supplies, clerical expenses and all salaries, bonuses and benefits paid to, or on behalf of, personnel of the Firm.

Neither the Firm nor its employees accept compensation, including sales charges or service fees, from any person for the sale of securities or other investment products.

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

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We are not entitled to a performance-based compensation. As a result, we do not face certain conflicts of interest that may arise when an investment adviser accepts performance-based fees from some clients, but not from other clients.

### **Item 7: Types of Clients**

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Our Subscribers, as mentioned in Item 4 above, which generally include fee-based Subscribers.

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

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The descriptions set forth in this Brochure of specific advisory services that we offer to Subscribers, should not be understood to limit in any way our activities. We may offer any advisory services, engage in any investment strategy and make any investment, including any not described in this Brochure, that we consider appropriate. The investment strategies we pursue are speculative and entail substantial risks. Subscribers should be prepared to bear a substantial loss of capital. There can be no assurance that the investment objectives of any Subscriber will be achieved.

#### ***Investment Objective***

While individual investment objectives vary, the firm aims to provide detailed analysis and advise for active and passive traders to generate returns in both the capital and derivatives marketplace.

### ***Risk Management***

While we do not manage any funds, individuals must manage their own risk. The firm focuses on diversification, limited exposure, position sizing, and management to mitigate risk on posted trade recommendations, and for general portfolio guidelines.

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

The following risk factors do not purport to be a complete list or explanation of the risks involved in an investment advised by us. These risk factors include only those risks we believe to be material, significant or unusual and relate to particular significant investment strategies or methods of analysis employed by us.

An investment involves significant risks and is suitable only for those persons who can bear the economic risk of the loss of their entire investment, and who have limited need for liquidity in their investment. There can be no assurances that we will achieve our investment objectives. An investment carries with it the inherent risks associated with investments in publicly traded stocks and bonds, options, and related instruments, including, without limitation, the risks described below. Each Subscriber should carefully review their subscription documents and any documents referred to herein before deciding to subscribe with Eagle Investors.

## **Item 9: Disciplinary Information**

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To the best of our knowledge, there are no legal or disciplinary events that are material to a Subscriber's evaluation of our advisory business or the integrity of our management.

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

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Neither we nor our management persons are registered as broker-dealers, and neither of us has any application pending to register with the SEC as a broker-dealer or registered representative of a broker-dealer, respectively.

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

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### ***Code of Ethics***

Eagle Investors has adopted a “**Code of Ethics**” that establishes the high standard of conduct that we expect of our employees and procedures regarding our employees' personal trading of securities. Our employees are required to certify their adherence to the terms set forth in the Code of Ethics upon commencement of employment and annually thereafter. Employees also are required to provide quarterly certifications of compliance with certain Code of Ethics provisions.

The foundation of our Code of Ethics is based upon the following underlying fiduciary principles:

- Employees must at all times place the interests of the Subscribers first;
- Employees must ensure that all personal securities transactions are conducted consistent with the Code of Ethics' Employee Personal Investment Policy (described below); and
- Employees should not take inappropriate advantage of their position at the Firm.

Employees are permitted to maintain personal brokerage accounts for the purpose of trading "**Reportable Securities**" (as defined in the Code of Ethics, and which includes a wide variety of investments such as stocks, bonds, fixed income, options, warrants, futures, and derivatives). All trading is reviewed on a regular basis by compliance. Employees are prohibited from participating in Initial Public Offerings ("**IPOs**"). Employees are also prohibited from personally, or on behalf of a Client, purchasing or selling securities that appear on the Firm's Restricted List.

Employees must obtain pre-approval from the CCO before: (i) engaging in any outside business activities; or (ii) making any private investments.

We will provide a copy of our Code of Ethics to our Subscribers, or any prospective Subscriber, upon request, to be viewed on the premises.

#### **Item 12: Brokerage Practices**

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At this time Eagle Investors does not engage in general securities transactions for Subscribers. Therefore, we do not select or recommend broker-dealers for Subscriber transactions.

#### **Item 13: Review of Accounts and Research**

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Our Firm Management continuously monitor and analyze the research we provide to ensure that it conforms with the internal guidelines of each Subscriber's membership agreement.

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

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We do not receive economic benefits from non-Subscribers for providing investment advice and other advisory services. Neither we, nor any of our related persons, directly or indirectly, compensate any person who is not a supervised person for Subscribers referrals.

#### **Item 15: Custody**

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Eagle Investors does not have physical custody of any Subscriber funds and/or securities and does not take custody of Subscriber accounts at any time.

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**Item 16: Investment Discretion**

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Eagle Investors does not have a discretionary relationship with any of its Subscribers.

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**Item 17: Voting Client Securities**

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Eagle Investors does not hold securities and therefore, is not required to vote any applicable proxies.

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**Item 18: Financial Information**

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We are not required to include a balance sheet for our most recent fiscal year, are not aware of any financial condition reasonably likely to impair our ability to meet contractual commitments to Subscribers and have not been the subject of a bankruptcy petition at any time during the past ten years.