



E6 Portfolios

Client Brochure

(Form ADV Part 2A)

08 December, 2023

This brochure provides information about e6 Portfolios, LLC qualifications and business practices. If you have questions about the brochure, please contact us at hello@e6Portfolios.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration does not imply a certain level of skill or training. Provision of this brochure does not relieve e6 Portfolios, LLC of any other disclosure obligations the firm may have under federal or state law. Additional information about e6 Portfolios, LLC is available by searching the SEC website at www.adviserinfo.sec.gov by firm name or CRD number (#326617).

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ITEM 2 – MATERIAL CHANGES

Ownership Clarification: Item 4 has been updated because e6 Portfolios' ownership structure has changed. The firm is now wholly owned by e6 Holding, LLC.

New Wrap Fee Program Renaming and Clarifications: The updated brochure clarifies the function and features of e6 Portfolios first Wrap Fee program, now called the e6 Portfolios Investment Strategists Wrap Fee Program.

New Wrap Fee Program Introduction: e6 Portfolios has also introduced a second Wrap Fee Program with this update called the e6 Portfolios SMA, SMP, UMP Wrap Fee Program. The program offers Separately Managed Accounts (SMA), Separately Managed Portfolios (SMP), and Unified Managed Portfolio (UMP) services which are described in this version of the brochure.

Wrap Fee Program Differentiation: Revisions throughout the brochure describe these two wrap fee offerings and the associated fees, limitations on the Qualified Custodian that can be used with each offering, introduction of paper statement fees, as well as conflicts of interest and risks.

The brochure also clarifies that the firm's SMA, SMP, UMP Wrap Fee Program provides platform access, reporting, and, in the case of the UMP offering, coordination of multiple accounts in a household. In turn, each offering makes use of specific security models offered by the e6 Portfolios Strategists Wrap Fee program. SMA, SMP, and UMP clients use these Investment Strategist models alone or in combination to deliver a balance of risk and opportunity that corresponds to their investment objectives and risk tolerance.

Wrap Fee Program Limitations: The Brochure clarifies that e6 Portfolios only offers services through its Wrap Fee Programs. As a result, some disclosures and explanations have been moved to the appropriate Wrap Fee Brochure.

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ITEM 4 – ADVISORY BUSINESS

About e6 Portfolios

e6 Portfolios, LLC was founded on April 18, 2023 and registered as an independent RIA on July 13, 2023. The firm is organized as a Limited Liability Company in the state of Utah and is wholly owned by e6 Holding, LLC.

As of October 27, 2023, e6 Portfolios managed \$0 in discretionary assets and \$0 in non-discretionary assets.

Wrap Fee Programs

e6 Portfolios provides investment management services exclusively through two interdependent Wrap Fee Programs. The first, the e6 Portfolios SMA, SMP, UMP Wrap Fee Program, offers Separately Managed Accounts (SMA), Separately Managed Portfolios (SMP), and Unified Managed Portfolio (UMP) services to clients. The second, the e6 Portfolios Investment Strategists Wrap Fee Program, offers clients a menu of specific security models called Investment Strategists. Clients in the first Wrap Fee Program use these Strategist models alone or in combination to deliver a balance of risk and opportunity that corresponds to their investment objectives and risk tolerance.

e6 Portfolios offers only investment management services. Investment advisory services (sometimes called “Wealth Management”) are not included in e6 Portfolio offerings. Clients may want to receive Wealth Management services and may engage a Registered Investment Advisory firm other than e6 Portfolios for these services. e6 Portfolios will work with third-party Investment Advisors and all the offerings described in this brochure allow the Client to authorize a third-party Investment Advisor to communicate instructions to e6 Portfolios on their behalf if a separate executed agreement is in place. However, not all e6 Portfolios Strategists are available to all third-party advisors and e6 Portfolios reserves the right to vet and elect not to work with any third-party Advisor at its sole discretion.

Since all services are provided through the firm’s two Wrap Fee Programs, please see the respective Wrap Fee Brochures for a detailed description of services provided, fees charged, and ongoing oversight provided.

Clients enrolled in Wrap Fee programs do not pay transaction expenses for accounts enrolled in the program, resulting in a lower overall cost for the client.

Investment Discretion

Clients in e6 Portfolios’ Wrap Fee Programs grant the firm discretionary trading authority in the account(s) so that the firm can implement the agreed-upon Wrap Fee Program Services. Discretion includes the authority to make all decisions to investigate, buy, sell, or hold

securities, cash, or other publicly traded investments on behalf of the client at e6 Portfolios' sole discretion and without first consulting the client. In their agreements with the qualified custodian, the client authorizes the custodian to follow e6 Portfolios' instructions concerning trading and other investment activity in the account on behalf of the client.

Termination

e6 Portfolios or the client may end the advisory relationship at any time without penalty or fee by giving written notice to the other party. Clients should review their Advisory Agreement for further details. Clients enter into relationships with the account custodian directly and should review their agreement with the custodian for conditions related to terminating the agreement (such as transfer-out fees).

ITEM 5 – FEES AND COMPENSATION

e6 Portfolios clients are required to enroll in the e6 Portfolios Wrap Fee Program so all fees are assessed through the Wrap Fee Program. Please see the e6 Portfolios SMA, SMP, UMP Wrap Fee Program Brochure and the e6 Portfolios Investment Strategists Wrap Fee Program Brochure for a detailed fee schedule.

Fee Calculation and Manner of Payment

Some services in the e6 Portfolios SMA, SMP, UMP Wrap Fee Program charge flat monthly fees, while some charge asset-based fees on a tiered basis. All services in the e6 Portfolios Investment Strategists Wrap Fee Program charge asset-based fees with no tiered reductions. Any tiered reductions are calculated and applied based on all assets in the client's household under management by e6 Portfolios. A "Client household" is generally limited to a person or a couple who share finances and their minor children; e6 Portfolios reserves the right determine the members of a client household.

All fees, whether flat monthly fees or asset-based fees are deducted from client accounts monthly in arrears. Asset-based fees are calculated based on the average daily balance of the account during the month. Advisory fees are not collected in advance. The client's agreements with e6 Portfolios and with their qualified custodian provide authorization to deduct management fees from the client's account directly and remit that fee to the firm. e6 Portfolios will send a bill to the qualified custodian indicating the amount of the fee to be paid. The custodian will send a statement to the client, at least quarterly, indicating the fee dispersed. Each time the fee is assessed, e6 Portfolios will make a statement available to the client showing the amount of the fee and how the fee was calculated. e6 Portfolios will disclose to clients their responsibility to verify the accuracy of the fee calculation.

e6 Portfolios believes that its Wrap Fee Program fees are reasonable but the firm's fees may be more than the cost of purchasing comparable services separately or through other advisors. Relative cost would depend on many factors including the cost of each service if provided separately, the comparative volume of trading, value provided, and the cost of trading.

e6 Portfolio fees are not negotiable but in some cases preexisting fee schedules may be grandfathered in. Fees are waived for Employees and affiliates.

Because e6 Portfolios uses a related-person manager, all fees charged, net of expenses, are paid to the portfolio managers.

Individuals recommending the wrap fee program do not receive additional compensation as a result of the client's participation in the program.

Transaction Costs

e6 Portfolios Wrap Fee programs bear the cost of all transactions that take place in the client account, including trading commissions, mutual fund ticket charges, clearance, and any other transaction costs. Because e6 Portfolios bears transaction costs, the firm may have a financial incentive to trade less frequently in Wrap Fee Program accounts than would be beneficial to the client. Similarly, many custodians offer non-transaction fee funds or do not charge commissions on ETF or equity trades. e6 Portfolios has an incentive to purchase these investments for the client rather than investments that have a trading cost.

Other Costs

Clients bear the cost of management fees and other expenses imposed directly by mutual funds or exchange traded funds held by the client; spreads paid to market makers; and any account maintenance fees agreed to with the Custodian such as custodial, account, or wire fees. See Item 12 for more information on Brokerage Practices.

Certain investment products (such as mutual funds or ETFs) incur additional fund-level expenses borne by the client and are described in full in the fund's prospectus.

Margin Costs

The custodians recommended by e6 Portfolios may make margin borrowing available to clients. e6 Portfolios does not recommend margin borrowing and does not incorporate margin exposure into its strategies, however, e6 Portfolios may facilitate margin borrowing at the client's request. Margin borrowing incurs interest and other costs to the client that vary by custodian and as interest rates change. e6 Portfolios does not bill on margin balances and does

not receive revenue from custodians related to margin borrowing and therefore has no incentive to recommend margin.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

e6 Portfolios does not accept performance-based fees.

ITEM 7 – TYPES OF CLIENTS

e6 Portfolios serves individuals, families, businesses, charitable organizations, and retirement plans. e6 Portfolios' investment management services do not have a formal minimum but may consider overall relationship size before agreeing to work with a client.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

e6 Portfolios constructs portfolios primarily consisting of mutual funds, closed-end funds, ETFs, and individual securities. In doing so, the firm relies on outside experts including Chartered Financial Analysts (CFAs), research firms, publicly available models published by reputable financial institutions, reputable third-party research firms, and Nobel Prize winning economists for advice on asset allocation and security selection methodology.

With this intellectual framework, the investment team relies on tools that include:

- Fundamental analysis of security, sector, and asset class characteristics
- Modern Portfolio Theory (MPT) best practices, including optimal allocation across asset classes and geographies, optimal index constitution, etc.
- Competing or complimentary theories of portfolio construction with an academic basis or verifiable evidence of merit
- Analysis of market and economic trends and conditions (GDP, interest rates, etc.)
- Published third party model portfolios by reputable and vetted institutions
- Investment vehicle characteristics including asset class coverage, performance, cost, etc.

Within this framework, the SMA SMP UMP Wrap Program focuses on meeting the investment needs of individual clients. Investment outcomes should be informed by client-specific factors including their tax-sensitivity, time horizon, beliefs and values, account size, investments held elsewhere, as well as platform limitations such as custodial capabilities, ease of use, reporting, and relative cost.

For this reason, the e6 Portfolios SMA SMP UMP Wrap Fee Program can be used together with multiple different individual investment models offered by the e6 Portfolios Strategist Wrap Fee program. Each Strategist introduces risks specific to the model and those risks are outlined fully in the e6 Portfolios Strategist Wrap Fee brochure.

Please see the e6 Portfolios SMA, SMP, UMP Wrap Fee Program Brochure and the e6 Portfolios Investment Strategists Wrap Fee Program Brochure for a detailed description of the investment strategies offered by each program and the accompanying risks.

ITEM 9 – DISCIPLINARY INFORMATION

There are no legal or disciplinary disclosures material to a client's consideration of e6 Portfolios.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

M. H. LeBlang, Inc. (dba "MHL Investments" or "MHL") is a broker-dealer and affiliated with e6 Portfolios. MHL Investments is a member of FINRA and the Securities Investor Protection Corporation (SIPC). Roy Jones and Joshua Jones are Registered Investment Advisors of e6 Portfolios, Registered Representatives and agents of MHL, financial planners of TomiPlan, and owners of all three companies. Dually registered e6 Portfolios associates may receive standard sales commissions from sponsors of alternative investment products through MHL Investments. All sales commissions are paid from the revenues of the product sponsors.

These activities represents a conflict of interest because it may create an incentive to recommend products based on the compensation received, rather than on the client's needs. These conflicts are disclosed through delivery of this Form ADV Brochure.

MHL is also active as an insurance agency and so Roy Jones and Joshua Jones, as licensed agents, may receive compensation for the sale of insurance products. This compensation through MHL is separate and distinct from e6 Portfolios's investment management revenue, and clients only pay once for services.

Registered Representatives of MHL or any other broker/dealer who works with e6 Portfolios may have an incentive to recommend investment products based on the variable compensation received. e6 Portfolios mitigates this conflict by limiting the offerings on the e6 Platform to publicly traded securities for individuals licensed as a Registered Representative. Registered Representatives of any broker/dealer are prohibited from offering their clients insurance, private placements, interval funds, non-traded securities, and other illiquid investments through e6 Portfolios as a condition to access the e6 Portfolios platform. e6 Portfolios will also not work with third-party Investment Advisors who allow the sale of AUM-based insurance, private placements, and illiquid investments. This means that dually registered individuals who utilize e6 Portfolios should only receive commission revenue for the portion of their portfolio comprised of insurance, private placements, and illiquid investments offered by their broker dealer and agency and they only receive a recurring AUM-based fee for liquid, publicly traded securities portfolios. This policy addresses conflicts of interest under the hybrid model such as recommending a mutual fund for a commission versus a fee-based account or a private placement for a commission versus a fee-based account. It also increases

transparency for the client. Clients of dually registered individuals may elect to only pay fees by limiting their relationship with their financial advisor to e6 Portfolios.

“Fee-only” Investment Advisor Representatives who are ineligible to receive commissions may access fee-based alternative investments. However, “fee-only” advisors face limitations in their offerings and have a conflict of interest in that there is an incentive to offer an inferior fee-based solution instead of referring their client to a more competitive solution offered by a third party that would not compensate them.

Conflicts of interest are present in every relationship and every corner of the financial industry. e6 Portfolios encourages clients to openly discuss conflicts of interest in detail with their advisor and select an advisor who is committed to transparency and the fiduciary standard of conduct, and has the professionalism and character to act in their best interest at all times regardless of how they are compensated.

Relationship with TomiPlan

e6 Portfolios believes that clients are best served when they have a financial plan in place prior to investing. e6 Portfolios works with any qualified, credentialed financial planner selected by the client, and refers clients who do not already have a financial planner to TomiPlan if they are in need of Financial Planning services. e6 Portfolios also provides TomiPlan with investment data aggregation capabilities used by licensed TomiPlan partners to assist their mutual clients with financial planning services.

TomiPlan is an affiliated company under shared ownership with e6 Portfolios so we have an incentive to recommend the TomiPlan. e6 Portfolios mitigates this conflict of interest by disclosing the relationship and prohibiting the sharing to, or receiving of, revenue between e6 Portfolios and TomiPlan.

e6 Portfolios provides data aggregation and white label reporting services to TomiPlan and also maintains financial planning assumptions (interest rate projections, asset class expected returns, etc) for TomiPlan.

Relationship with Everspire and Synchrony Wealth Management

Aegis Wealth Group LLC /dba Everspire is a Registered Investment Advisor and is affiliated with e6 Portfolios because it is owned by the same individuals. Synchrony Wealth Management provides advisory services through Everspire. Everspire and Synchrony Wealth Management focus on Wealth Management by providing dedicated financial advisors to help clients implement financial plans. Both firms recommend e6 Portfolios to its clients for investment management services. e6 Portfolios also provides billing and white-label reporting services to Everspire and Synchrony. e6 Portfolios recommends Everspire or Synchrony Wealth Management to its clients who may be in need of a dedicated advisor. This presents a conflict of interest since Everspire benefits from the advisory revenue and Everspire and e6 Portfolios

are affiliated. e6 Portfolios mitigates this conflict of interest by disclosing it and prohibiting direct compensation or sharing of revenue between e6 Portfolios and Aegis Wealth Group LLC /dba Everspire or Synchrony Wealth Management.

e6 Portfolios does not recommend or select other investment managers for clients.

Relationship with Third-Party Investment Advisors

e6 Portfolios clients may authorize e6 Portfolios to accept instructions from the client's third-party investment advisor. This authorization is granted under a separate agreement. This third-party investment advisor agreement instructs e6 Portfolios to accept instructions regarding Risk Profile selection, changes in risk profile, cash movement, purchase or sale of investments, cash management, and other account issues from the third-party investment advisor.

Communications from the third-party Investment Advisor contain significant decisions about investment strategy, risk profile, e6 Portfolios offering selected (and therefore the fees paid). Client agrees under separate agreement to inform e6 Portfolios of changes to the relationship between Client and the third-party Investment Advisor and to provide e6 Portfolios with accurate contact information and inform the firm of any changes to their contact information.

Selection and Compensation of Other Advisors and Managers; Client Referrals

In circumstances when a client needs a highly specialized solution, e6 Portfolios may recommend or select specialized investment advisor partners for clients, with the additional fee offset by a corresponding e6 Portfolios fee reduction of their standard fee arrangement for enhanced tax loss harvesting services, or for an additional fee for defensive derivative overlays that is not shared with e6 Portfolios. Other investment advisors may recommend e6 Portfolios to their clients or engage e6 Portfolios directly to provide investment management services. e6 Portfolios does not compensate advisors for referrals and does not accept compensation for referrals.

ITEM 11 – ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

e6 Portfolios has adopted a Code of Ethics in accordance with rules issued by the SEC under the Investment Advisers Act of 1940. The Code of Ethics contains provisions that, among other things:

- Set forth standards of conduct expected of advisory personnel;
- Safeguard material non-public information about clients and client transactions;
- Require access persons to report their personal securities transactions;
- Defines conflicts of interest and describes prohibited activities;
- Requires compliance with the broad antifraud provisions of the Advisers Act; and
- Adheres to the principles outlined in "Real Fiduciary Practices: Professional Conduct

Guidance for Advisors,” published by the Institute for the Fiduciary Standard.

e6 Portfolios’s complete Code of Ethics is available upon request by contacting our office at hello@e6Portfolios.com.

Investing Personal Money in the Same Securities as Clients

e6 Portfolios and its associated persons do not recommend to or buy or sell for clients any securities in which the firm or its associated persons have a material financial interest.

e6 Portfolios related persons often invest in the same or similar securities to those that are held by clients through their chosen Strategist model(s). Many transactions are mutual funds, which do not present trading conflicts of interest. Similarly, fee-only private investments and insurance products do not present trading risks. However, ETF, stock, and bond transactions may present a conflict of interest because client trades in the security may affect the share price and create opportunities for “front running” and other abuses. To mitigate conflicts of interest, related persons are required to link securities accounts to the e6 Portfolios platform for supervision or report their transactions quarterly. Employee trades are reported to the firm and reviewed to ensure that e6 Portfolios clients are not disadvantaged by the trading activity.

ITEM 12 – BROKERAGE PRACTICES

e6 Portfolios relies on the specific capabilities of the qualified custodians clients use to implement its Strategist offerings. As a result, not all of our Wrap Fee Program services are available at every custodian. Please see the e6 Portfolios SMA SMP UMP Wrap Fee Brochure for more information on which offerings are available at which custodians.

e6 Portfolios recommends Qualified Custodians to Clients based on quality of execution, reliability, impartiality, service, capabilities, quality of technology, and reasonableness of cost in relation to comparable broker/dealers. e6 Portfolios monitors broker/dealer compensation and evaluates whether it is clients’ interest to explore new custody options. e6 Portfolios does not accept direct payments or soft dollar benefits from brokers. However, since e6 Portfolios pays differing transaction fees and platform fees to different custodians, there is an incentive to recommend the custodian that incurs the lowest cost to e6 Portfolios. which may not always be the lowest cost for the client.

Qualified custodians provide e6 Portfolios and its clients access to institutional brokerage services including a range of investment products, execution of securities transactions, and custody of client assets. The investment products available through institutional platforms include some to which clients might not otherwise have access or that would require higher minimums by clients acting individually. These services directly benefit clients or their account(s) and are made available on an unsolicited basis and at no charge to us or the client.

Qualified custodians also make available other products and services that benefit e6 Portfolios but may not directly benefit the client or their account(s) directly or at all. For example, the custodian may provide research resources that may be used to improve service to all or some client accounts, including accounts not maintained at the custodian providing the research. Qualified custodians also provide software and other technology; support for third-party service providers; trade aggregation for multiple client accounts; market data; and assistance with back-office functions, recordkeeping, and client reporting.

Other services may help e6 Portfolios develop its business. These services might include educational conferences and events; technology, compliance, legal, and business consulting; publications and conferences on practice management; and access to employee benefits providers, human capital consultants, and insurance providers. Custodians may provide some of these services themselves or may arrange for third-party vendors to provide the services to e6 Portfolios at a discount or at no cost. These services are not contingent on e6 Portfolios committing any specific amount of business to the custodian in trading commissions or assets in custody, nor are they based on e6 Portfolios giving any particular investment advice or buying particular securities for clients. Access to resources that do not directly benefit clients may play a part in e6 Portfolios' choice of custodians. e6 Portfolios addresses this conflict of interest by carefully vetting its custodians based their ability to assist in e6 Portfolios in delivering the best value and experience and providing clients a range of custodial options.

e6 Portfolios does not receive client referrals from its qualified custodians and the firm does not allow directed brokerage.

Clients may request an alternative broker/dealer to custody their assets. However, the alternative custodian may not approve e6 Portfolios on their platform, e6 Portfolios may not be able to implement a specific Strategist on that platform, and e6 Portfolios will consider relationship size before agreeing to work with the additional custodian.

e6 Portfolios aggregates client trades on a best-efforts basis. The bulk of client assets in qualified accounts are invested in mutual funds which are not vulnerable to trading conflicts of interest. Client trading in non-qualified accounts is done primarily through ETFs or individual securities. These transactions are generally small in size relative to the daily volume in the security which minimizes any potential inequities created by sequence of transaction. Other circumstances inherently preclude aggregation, such as client-directed liquidation or distribution of funds, new deposits arriving in only one account, etc. It is possible that these aggregation practices may result in less favorable execution for one client than another.

e6 Portfolios aggregates client trades on a best-efforts basis. A significant portion of client assets are invested in mutual funds which are not vulnerable to trading conflicts of interest. Client assets may also be invested in ETFs or individual securities. These transactions are generally small in size relative to the daily volume in the security which minimizes any potential inequities created by sequence of transaction. For Investment Strategists that rely on a Qualified Custodian providing automated investing services, trade aggregation may be done at

the Custodial level but be out of e6 Portfolios' control. Other circumstances inherently preclude aggregation, such as client-directed liquidation or distribution of funds, new deposits arriving in only one account, etc. These factors and aggregation practices mean that it is possible that one client may receive less favorable execution than another in some cases.

However, e6 Portfolios does use aggregated trading whenever possible when the same ETF or security is purchased or sold for more than one client at the same time. In cases where aggregated trading is used, a target trade size and allocation among client accounts will be established, the shares will be purchased or sold, an average price established, and the trade allocated among client accounts at the established average price. If it is not possible to buy or sell the planned number of shares, the partial trade will be allocated among clients proportionally according to the planned allocation. In some cases, e6 Portfolios may make use of aggregated trading for the same security more than once during a single trading day for different groups of clients, resulting in different average prices for different groups of clients.

e6 Portfolios may enroll clients in custodial securities lending or yield enhancement programs when available and shares all the revenue from these programs with the clients to enhance returns. These programs may increase the number of shares available in the market for short-selling. Clients must notify e6 Portfolios if they wish to opt-out of these services.

ITEM 13 – REVIEW OF ACCOUNTS

Client accounts are reviewed on an ongoing basis to ensure that the investments in their account correspond with their stated risk profile and investment goals and rebalanced accordingly. Clients are required to apprise the firm of material changes in their risk profile, investment goals, or investment portfolio election.

e6 Portfolios publishes a written statement for each client which is available online or from the mobile app. This report shows a summary of activity (including fees and performance), allocation information, detailed analytics, and a fee calculation and invoice. Additionally, clients can print a wide variety of custom reports on demand.

Account custodians generate brokerage statements no less than quarterly. These statements are provided by the custodian to the client and list the account positions, activity, and the fees paid to e6 Portfolios. Clients may elect to receive trade confirmations from the account custodian whenever activity occurs and trade confirmations are archived on the custodial portal where they can be accessed at any time.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

The firm does not directly or indirectly compensate any person who is not a supervised person, nor receive any economic benefit from anyone other than a client for providing services to the firm's clients.

ITEM 15 – CUSTODY

e6 Portfolios will never take custody of client funds or securities. However, because e6 Portfolios withdraws advisory fees directly from client accounts, the SEC deems the firm to have custody in a limited capacity. A qualified custodian sends account statements quarterly, or more frequent, to e6 Portfolios clients and clients should carefully review those statements.

As a courtesy to clients, e6 Portfolios monthly statements are capable of supporting a wide range of custodians, including accounts not advised by e6 Portfolios. The firm makes every effort to insure these consolidated statements are accurate but clients should compare them to the statements they receive from the qualified custodian.

ITEM 16 – INVESTMENT DISCRETION

e6 Portfolios clients grant the firm discretionary trading authority in the account(s) so that the firm can implement the agreed-upon offering. Discretion includes the authority to make all decisions to investigate, buy, sell, or hold securities, cash, or other publicly traded investments on behalf of the client at e6 Portfolios' sole discretion and without first consulting the client. In their agreements with the qualified custodian, the client authorizes the custodian to follow e6 Portfolios' instructions concerning trading and other investment activity in the account on behalf of the client.

Unless otherwise agreed, in cases where a client grants discretion, the accounts a client transfers to e6 Portfolios will be liquidated and the proceeds reinvested in the strategy chosen by the client.

ITEM 17 – VOTING CLIENT SECURITIES

e6 Portfolios does not accept authority to vote Client securities. Clients will receive proxy voting information directly from their account custodian unless the client directs the custodian that they do not wish to receive those communications. e6 Portfolios does not generally provide information or recommendations to clients regarding specific proxy votes.

ITEM 18 – FINANCIAL INFORMATION

e6 Portfolios does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. e6 Portfolios does not have discretionary authority or custody of client funds or securities, or require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

e6 Portfolios has never been the subject of a bankruptcy petition.