

**Item 1: Cover Page**  
**PART 2A OF FORM ADV: FIRM BROCHURE**

**March 2024**



**Emergent Global Investments, LLC**

**Investment Advisory Firm CRD # 290875**

Emergent Global Investments, LLC also does business as:

“Emergent Global Wealth Management”

“Emergent Wealth Management” “EGI”

“Atrio Advisors” “Atrio Wealth”

“My Impact”

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*This brochure provides information about the business practices and qualifications of about Emergent Global Investments, LLC. Any inquiries regarding the contents of this brochure should contact Cesar Murillo at (305) 497-8243 or by email at: [cesar.murillo@emergentgi.com](mailto:cesar.murillo@emergentgi.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.*

*Additional information about Emergent Global Investments, LLC and/or Cesar Murillo is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

*Registration does not imply a certain level of skill or training.*

**Item 2: Material Changes**

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## Item 4: Advisory Business

Emergent Global Investments, LLC (“EGI”) is registered as an Investment Adviser headquartered in the state of Florida since January 2018. Mr. Cesar Murillo is the 100% principal owner of EGI. As of December 31, 2023, EGI had \$14,090,981.00 in assets under management (aum) on a discretionary basis. Emergent Global Investments, LLC, may also be referred to as “Atrio Advisors”, “Atrio Wealth”, “My Impact”, “Emergent Global Wealth Management”, “Emergent Wealth Management”, and “EGI”.

### Investment Management

EGI provides continuous financial advice and guidance to our clients regarding the strategic and tactical investment decisions. Investments are chosen and structured based on the individual needs of each client. During the discovery process, we listen actively to the client's known and unknown objectives, time horizons, risk tolerance, and liquidity needs. We also review and discuss the client's prior investment history, as well as family composition and investing background. We then assist clients with the management of their investments on a discretionary and/or non-discretionary basis. Account supervision and structure is guided by a client’s objectives (i.e. capital appreciation, growth, income, or growth and income), as well as their specific tax implications. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors on assets managed on a discretionary basis. Our investment recommendations and decisions are not limited to any specific security or industry and may include investment advice regarding the following types on investment vehicles:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Domestic Equities
- Foreign Equities
- Corporate Bonds
- Commercial paper
- Certificates of Deposit
- Municipal bonds
- U.S. Treasuries
- Tax free fixed income
- Equity/Index Options
- 3<sup>rd</sup> Party Money Managers
- Commodities
- Alternative Investments
- Hedge Funds
- REITs

Because some types of investments involve certain additional degrees of risk, they will only be implemented or recommended when consistent with a client's stated investment objectives, risk tolerance, liquidity, and suitability.

### Financial Planning:

EGI Advisors and their clients work together to analyze the client's current financial situation and in most situations focus on areas of concern and interest that may impact their short and long term goals. In some instances a conflict of interest may exist and EGI will make financial planning clients aware of these potential conflicts of interest.

- A. A conflict exists between the interests of the investment adviser and the interests of the client,
- B. The client is under no obligation to act upon the investment adviser's recommendation, and
- C. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

During the financial planning process, EGI Advisors analyze the client's current financial situation and in most situations focus on areas of concern and interest that may impact their short and long term goals. These areas may include:

**Estate Planning:**

EGI provides an analysis of clients current exposure to estate taxes and clients current estate plan, which may include whether clients have a will, powers of attorney, trusts and other related documents. EGI will discuss ways for clients to minimize and/or avoid potential current and future estate taxes by implementing appropriate estate planning strategies. We are available to work with a clients' current attorney and/or assist clients in finding a qualified estate planning attorney.

**Financial Goals:**

EGI helps clients identify personal financial goals and assists them in developing a plan to reach these goals and dreams. EGI will assist in determining what resources a client needs and what investments are appropriate to reach these financial goals.

**Investment Planning:**

EGI reviews client current investment asset allocation strategy and target asset mix along with clients' risk tolerance and time horizon in an effort to evaluate the appropriateness of each and every investment. We also assist clients in reviewing employee stock options and purchase plans as well as other areas of investment related concern.

**Retirement Planning:**

EGI believes that it is always a good time to invest for/in the future and EGI assists clients with their retirement planning journey by guiding them to and through their retirement. EGI helps clients understand this process, where they are currently positioned, provide ideas to make the most of their savings and investments, and shows them what they can do to stay on track for the retirement they envision.

**Risk Management:**

EGI uses risk management to identify, analyze and accept or mitigate uncertainty within investments. Essentially, risk management occurs any time an investor analyzes and/or attempts to quantify the potential for losses of an investment and then takes the appropriate action (or inaction) given his investment objectives and risk tolerance.

**Tax Planning:**

EGI conducts an analysis of a client’s financial situation or plan from a tax perspective. The purpose of tax planning is to ensure tax efficiency, with the elements of the financial plan working together in the most tax-efficient way possible.

**Investment Advisor to Private funds:**

EGI may act as an investment manager to private funds / pooled investment vehicles. These services are negotiated and agreed upon prior to EGI acting as an investment manager to the fund(s).

## Item 5: Fees and Compensation

The EGI investment advisory contract may be terminated by the client within seven (7) business days of the signing of the investment advisory contract and the client will not be responsible for advisory fees incurred during that time. EGI will receive compensation based on the type of advisory services EGI performs. Please review the fee and compensation information below.

Lower fees for comparable services may be available from other sources.

**Investment Advisory Fee Structure**

EGI advisory fees are charged in arrears and are based on the market value of the assets under management and calculated as follows:

Account Value	Annual Advisory Fee
First \$50,000.00	1.90%
Next \$200,000.00	1.50%
Next \$250,000.00	1.25%
Next \$500,000.00	1.00%
Next \$2,500,000.00	0.75%
Next \$2,500,000.00	0.50%
Over \$6,000,000.00	Negotiated

**Fee Billing**

EGI’s financial planning and investment management fees are billed quarterly, in arrears based on the average quarterly balance broken down daily of the accounts managed by EGI. EGI will send an invoice to clients based on the aggregated amount of all accounts managed by EGI. Clients have the option of paying the fee directly to EGI. If payment is not received by the end of the month in which the invoice is sent, EGI has the consent and authority to deduct the fee due directly from the client’s account. If the contract is terminated by either party, through a letter of instruction, prior to the end of the billing period, the advisory fee will be prorated based on the number of days the client received advisory services.

**Other Fees and Expenses**

EGI does not charge additional fees other than the Investment Advisory Fees that are charged. EGI does not receive or share any additional fees or expenses incurred by advisory clients.

EGI may charge negotiated fees for private and pooled investment management services that may differ from the above fee structure.

EGI clients will incur brokerage and other transaction costs by the custodian. EGI does not receive these fees nor does it share in these fees; see Item 12 for additional information.

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

EGI does not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in client advisory accounts.

EGI's private and pooled investment clients may charge performance based fees to their clients. EGI receives no additional fees other than the agreed upon management fees negotiated and EGI does not share in any performance based fees.

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

EGI's clients include individuals, business entities, pension & profit sharing plans, trusts, estates, and charitable organizations. EGI does not generally require an annual minimum fee or asset level for investment advisory or investment planning services.

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

EGI may use the following methods of analysis when providing investment advice to clients:

**Technical Analysis** -Technical Analysis involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks. The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis** - Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Cyclical Analysis** - Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Quantitative Analysis** - Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Qualitative Analysis** - Qualitative analysis is a securities analysis that uses subjective judgment based on unquantifiable information, such as management expertise, industry cycles, strength of research and development, and labor relations. Qualitative analysis contrasts with quantitative analysis, which focuses on numbers that can be found on reports such as balance sheets. The two techniques, however, will often be used together in order to examine a company's operations and evaluate its potential as an investment opportunity.

### **Investment Strategies**

EGI believes that asset allocation across diverse investment is the key to long term success in reaching client objectives. A Client's portfolio is customized to that client's specific investment objectives and risk tolerance. Each portfolio is constructed using a strategic asset allocation methodology, with prevailing long-term trends in mind. Short-term trends and strategies will not be employed unless necessary in accordance with Client mandates. EGI structures portfolios using a proprietary methodology. EGI believes that Clients will benefit from having a portfolio of holdings invested in a variety of assets classes. To the extent that these asset classes are non-correlated, the portfolio will experience investment returns with mitigated risk. EGI will not pursue strategies that are highly speculative and risky in nature.

### **Risk of Loss**

Investing in securities involves risks, including the loss of capital. Securities will and do fluctuate in value. Clients should understand and be prepared for these fluctuations in value as well as for the potential of loss. EGI assists clients in determining an appropriate asset allocation strategy based primarily on their risk tolerance and time horizon. Even with these methods in place, there is no guarantee that a client will meet or exceed their investment goals. EGI will continually review a client's investment goals, financial situation, time horizon, tolerance for risk and other factors at least annually to determine if the current asset allocation is still appropriate for that client. A client's participation and understanding of the process, including full and accurate disclosure of any and all relevant information, is an essential piece to the client understanding the risks involved. EGI relies heavily on the information provided by the client in determining the appropriateness of any investment portfolio. Therefore, the responsibility lies with the client to relay accurate and up to date information to EGI. This information should include any material changes in the client's financial condition, goals or other factors that may affect this analysis. The risks associated with a particular strategy or investment is provided to and discussed with each client in advance of investing the client's assets.

**Margin** - Margin enables the investor and/or the Advisor to leverage securities you already own, purchase additional securities through the ability to borrow and leverage, sell securities short, or it can also be used as a line of credit. While there are many benefits to the use of a margin account, it's also very important to understand the risks of using margin, as margin can not only increase your returns it can also dramatically magnify your losses.



With the client's approval EGI may use margin. Margin is primarily used as a tool in managing the allocation during the rebalancing of client accounts. However, qualified clients with a risk tolerance of speculation and the appropriate approvals may allow and or request EGI to short exchange traded equities.

*Market Risk* - All securities are subject to market, economic, liquidity other risks. The success of a particular investment depends upon the accurate assessment of the future path of price movements of individual securities. While performance of individual securities is assessed, individual security performance should also be viewed within the context of the overall portfolio. There can be no assurance that EGI will be able to predict price movements accurately.

Each and every investment has its own specific risk spectrum and these risks will vary by the specific investment. The following are some of the basic risks associated with the asset classes mentioned in Item 4 of this ADV Part 2.

*Capital risk* — Investment markets are subject to economic, regulatory, market sentiment, and other risks. All investors should consider the risks that may impact their capital, before investing. The value of your investment may become worth more or less than at the time of the original investment.

*Commodity risk* — Commodities markets can be more volatile than traditional investments such as equity or fixed income securities. Commodities may be affected by changes in overall market movements, interest rate changes, and/or events affecting a specific commodity and/or industry.

*Counterparty risk* — is risk that one party to a transaction might default on its contractual obligation. Counterparty risk can increase for those transactions not executed on a regulated exchange.

*Default risk* — is the risk that a company or an individual security will be unable to make the required payments on their debt obligation. Lenders and investors are exposed to default risk in virtually all forms of credit extensions.

*Company risk* — Common stocks of individual companies are subject to many risk factors including, but not limited to, economic conditions, government regulations, market risk, and industry risk. Equity security prices may decline as a result of adverse changes in these and other factors. Some equities are more volatile than others and may present higher risk of loss.

*Credit risk* — the value of fixed income securities may decline, and/or the issuer or guarantor of that security may fail to pay interest or principal when the payments are due. As a general rule, lower rated securities carry a greater degree of credit risk, and therefore have a greater risk of loss, than higher-rated securities.

*Currency risk* — Investments that are held or exposed to foreign currency, are exposed to fluctuations in a foreign exchange rate or rates in addition to the risks associated with the specific underlying investment.

*Equity market risk* — Equity markets are subject to many risk factors, including economic conditions, government regulations, market sentiment, local and international political events, and environmental and technological issues.

*Fixed Income risk* — risks associated with fixed income securities may include, but are not limited to, economic conditions, government regulations, credit worthiness, and fluctuations in interest rates. The secondary market value of fixed income securities will fluctuate with changes in interest rates, liquidity, and the creditworthiness of the specific issuer.

*Foreign Market risk* — foreign investments present risks that include changes in currency exchange rates, liquidity, economic, and political uncertainty. These risks may be greater in emerging markets.

*Interest Rate risk* — Changes in interest rates will affect investment values. This volatility will typically be greater for long term fixed income securities than for short term fixed income securities. Changes in interest rates may also affect the value of other financial assets.

*Issuer risk* — A security issued by a particular issuer may be impacted by factors that are unique to that issuer and thus may cause that security's return to differ from that of the market.

*Liquidity risk* — Investments with low liquidity can have significant changes in market value, and there is no guarantee that these securities can be sold at fair market value.

*Management risk* — Investment strategies implemented by a management team of a specific investment fund that doesn't perform as expected may underperform or suffer significant losses. Management also risk includes personnel turnover of specific individuals hired to manage a fund.

*Tracking risk* — The volatility in the performance of an investment may create a deviation relative to its index/benchmark, because of various factors, which may include, but are not limited to, active management decisions associated with the underlying investments and fees.

**Here is a list of the investments types listed in "Item 4" of this ADV Part 2A, with the 3 main risks most commonly associated with each:**

- **Mutual Funds** - Market risk, Management risk, Tracking risk.
- **Exchange Traded Funds (ETFs)** - Market risk, Management risk, Tracking risk.
- **Domestic Equities** - Market risk, Company risk, Liquidity risk.
- **Foreign Equities** - Currency risk, Foreign Market risk, Company risk.
- **Corporate Bonds** - Interest Rate risk, Issuer risk, Liquidity risk.
- **Certificates of Deposit** - Fixed Income risk, Interest Rate risk, Liquidity risk.
- **Municipal Bonds** - Fixed Income risk, Interest Rate risk, Credit risk.
- **U.S. Treasuries** - Fixed Income risk, Interest Rate risk, Credit risk.
- **REITs** - Issuer risk, Liquidity risk, Management risk.
- **Commodities** - Commodity risk, Interest Rate risk, Liquidity risk.
- **Preferred Stocks** - Interest Rate risk, Issuer risk, Liquidity risk.

While EGI has provided a comprehensive list of risks associated with investing in financial markets there may be additional risks that have not been listed above. Clients should consult with their EGI representative about any additional risks with which they may be concerned.

Investing in securities involves risk of loss that clients should be prepared to bear.

## **Market Risks**

All securities, particularly individual equity and debt securities are subject to market volatility, economic factors and certain other market risks. The success of a particular investment may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that EGI will be able to predict those price movements accurately.

## **Item 9: Disciplinary Information**

EGI has not been the subject of any disciplinary actions and does not have any legal of disciplinary information to disclose. Any disciplinary information regarding EGI's Investment Advisor Representatives is disclosed here as well as additional information being disclosed on the IAR's EGI's ADV Part 2B.

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

Neither EGI, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither EGI, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

EGI has entered into a "Solicitors Agreement" with Atrio Wealth, LLC. Atrio Wealth is a JT marketing venture between, Mr. Cesar Murillo and Mr. Alfonso Arria of Atrio Insurance Group, LLC. This is a reciprocal agreement and the details will be disclosed to each prospect/client of EGI prior to entering into an advisory contract with EGI.

## **Item 11: Code of Ethics, Client Transactions and Personal Trading**

### **Code of Ethics**

EGI & its employees are committed to a Code of Ethics that is available for review and will be provided to clients and prospective clients upon request. EGI's Financial Planning & Investment Management strives to comply with all applicable laws and regulations governing its practices. Therefore, EGI has set forth guidelines for professional standards of conduct for its associated persons, the goal of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith, and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines. Associated persons are also required to report any violations of the Firm's Code of Ethics. Additionally, EGI maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about clients or their account holdings by EGI or any associated person.

### **Participation or Interest in Client Transactions**

Neither EGI 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**

Our firm or persons associated with our firm may buy or sell securities for clients at the same time we or persons associated with our firm buy or sell such securities for our own accounts. A conflict of interest exists in such cases because we have the ability to trade ahead of clients and potentially receive more favorable prices than clients will receive. To mitigate this conflict of interest, it is our policy that we shall not have priority over client accounts in the purchase or sale of securities.

## **Item 12: Brokerage Practices**

### **Selecting Brokerage Firms**

EGI can work with multiple custodians and will often recommend clients work with the qualified custodian that they feel most comfortable with (i.e. Charles Schwab). EGI does not receive fees or commissions from these arrangements. EGI will recommend a custodian based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

### **Best Execution**

We believe in using custodians that provide the best services at competitive rates. The reasonableness of commission rates is based on several factors, including the broker's ability to provide professional services, execution, the broker's reputation, experience and financial stability of the broker or dealer, and the quality of service rendered by the broker or dealer in transactions. Best execution is not measured solely by reference to commission rates. Paying a broker a higher commission rate than another broker might charge is permissible if the difference in cost is reasonably justified by the quality of the brokerage services offered. Each of the above mentioned custodians has a history of best execution performance that is well documented in various publications and testing results.

### **Order Aggregation**

It is EGI's practice to aggregate transactions across multiple client accounts when possible.

### **Directed Brokerage**

In limited circumstances, and at our discretion, some clients may instruct EGI to use one or more particular brokers for the transactions in their accounts. If clients choose to direct our firm to use a particular broker, clients should understand that this might prevent from effectively negotiating brokerage commissions on clients behalf. This practice may also prevent EGI from obtaining a favorable price and execution. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that clients will obtain through a particular broker are adequately favorable in comparison to those that we would otherwise obtain for clients.

### **Trade Errors**

Trading errors can and do happen. If a trade error occurs when entering a trade on behalf of a client, EGI's policy is to restore a client's account to the position it should have been in had the trade error had not occurred. Depending on the circumstances, corrective actions may include canceling/busting said trade, adjusting the client account to reflect the appropriate asset allocation and/or the reimbursing of any fees to the client account.

**Services that do not directly benefit a client.**

The Custodian also makes available to us, other products and services, known as “Soft Dollars” that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both the custodian’s own and that of third parties. We use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at the custodian. In addition to investment research, the custodian also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients’ accounts
- Assist with back-office functions, recordkeeping, and client reporting

**Services that benefit us.**

The custodian also offers other services intended to help us manage and further develop our business enterprise. These services include:

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

The custodian provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. The custodian can also discount or waive its fees for some of these services or pay all or a part of a third party’s fees. The custodian can also provide us with other benefits, such as occasional business entertainment of our personnel.

**Our interest in the custodian’s services**

The availability of these services from the custodian benefits us because we do not have to produce or purchase them. We don’t have to pay for the custodian’s services. These services are not contingent upon us committing any specific amount of business to the custodian in trading commissions or assets in custody. This creates an incentive to recommend that you maintain your account with the custodian, based on our interest in receiving The custodian’s services that benefit our business and The custodian’s payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of the custodian as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of the custodian’s services (see “How we select brokers/ custodians”) and not the custodian’s services that benefit only us.

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

### **Periodic Reviews**

Financial Plans are reviewed at least annually and updated by EGI on a periodical basis as deemed necessary by EGI and said client. Cesar Murillo is EGI's supervised person that oversees the reviews of financial plans. Reviews are ongoing and are done quarterly, semiannually and/or annually as predetermined by EGI and the client. Portfolio and financial plan reviews are and in most cases predetermined in advance with EGI clients. Reviews may also be prompted by the client and/or EGI at any given time.

### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

### **Regular Reports**

EGI clients receive monthly and/or semi-annual portfolio performance statements from the custodian holding client assets. In addition, clients also receive transaction confirmations from the account custodian being used.

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

EGI has entered into a "Solicitors Agreement" with Atrio Insurance Group, LLC, Principle Mr. Alfonso Arria, 999 Brickell Ave. Suite 900 Miami, FL 33140. This is a reciprocal agreement and the details will be disclosed to each client affected prior to entering into an advisory contract with EGI. This agreement allows EGI and Atrio to be directly compensated for client referrals.

## **Item 15: Custody**

EGI does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients may choose a qualified custodian of their own preference. If a client has no preference of a qualified custodian, EGI may recommend a qualified custodian to clients (i.e. Interactive Brokers, Assetmark). Qualified custodians may allow for direct debit of advisory fees. Therefore, if a custodian allows for direct debiting and the client chooses to have advisory fees direct debited from their accounts, EGI may directly debit clients account(s) for the payment of our advisory fees. This ability to deduct advisory fees from clients account(s) falls under the category of trade authorization over client funds or securities. EGI does not have physical custody of any client funds and/or securities. Client funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. Clients will receive account statements from the independent, qualified custodian(s) holding client's funds and securities at least quarterly. The account statements from client's custodian(s) will indicate the amount of our advisory fees deducted from clients account(s) each billing period. Clients should carefully review account statements for accuracy. If clients have a question regarding account statements or if clients did not receive a statement from the custodian, please contact EGI at the contact information provided on the front page of this brochure.

### **Safe Keeping and Safeguards In Custody**

If EGI has custody of client funds it is solely a consequence of:

- A. EGI's authority to make withdrawals from client accounts to pay its advisory fee.
- B. The investment adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- C. Each time a fee is directly deducted from a client account, EGI concurrently:
  - i. Informs the qualified custodian the amount of the fee to be deducted from the client's account;
  - ii. The custodian sends the client a statement showing the deduction of the fee. This may include the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee. Clients may request a detailed itemization of the fees paid at any time and for any reason.
- D. EGI has implemented these transparent safeguards to help protect clients and client assets

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

EGI can and will accept discretionary trading authority to manage investment accounts on behalf of EGI clients. EGI has the authority to determine, without obtaining specific client consent, the investments to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority allows EGI to place trades in clients' accounts on their behalf so that we may promptly implement the investment policy that clients have approved in writing. Discretionary authority is granted via a limited power of attorney executed by the client. Clients have a right to decline to implement any advice provided by EGI on a non-discretionary basis. The client approves the custodian to be used to house assets/investments and the commission rates paid to the custodian. EGI does not receive any portion of the transaction fees and/or commissions paid by the client to the custodian on any given trade/transaction.

### **Discretionary Authority for Sub-Manager(s)**

With respect to accounts which have pieces managed outside of EGI as a "Sub-Manager", EGI will have discretion to hire and fire such Sub-Manager(s), determine the portion of the client's account that shall be managed by any given Sub-Manager(s) and to change the allocation of assets used by said Sub-Manager, delegate discretionary investment authority over designated assets to the Sub-Manager(s), which will authorize Sub-Manager(s) to buy, hold, or sell securities for the client's assets delegated to the Sub-Manager(s), and select the broker-dealers through which transactions for the sub-account will be effected.

## **Item 17: Voting Client Securities**

### **Proxy Votes**

EGI will not vote proxies on behalf of advisory accounts. At a client's request, EGI may offer clients information regarding corporate actions and the exercise of a client's proxy voting rights. If clients own shares of common stock or mutual funds, clients are responsible for exercising client's right to vote as a shareholder. In most cases, clients will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, the materials would be forwarded directly to clients by mail, unless clients have authorized the firm to contact clients by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

### **Class Action Lawsuits**

EGI does not determine if securities held by clients are the subject of a class action lawsuit or whether clients are eligible to participate in said class action settlement or litigation nor does EGI initiate or participate in litigation to recover damages on a client's behalf for damages as a result of said actions, misconduct, or negligence of said party.

## **Item 18: Financial Information**

### **Financial Condition**

EGI does not have any financial situations that will result in EGI from meeting contractual commitments to its clients. EGI does not have, or plan to take, custody of client assets, and EGI does not require the prepayment of advisory/management fees.

## **Item 19: Requirements for State-Registered Advisers**

- A. EGI currently has only one management person and/or executive officer; Mr. Cesar Murillo. Mr. Cesar Murillo's education and business background can be found on the Supplemental ADV Part 2B form.
- B. Mr. Cesar Murillo's other business activities can be found on ADV Part 2B.
- C. EGI does not accept performance-based fees or other fees based on a share of capital gains on and/or capital appreciation of the assets of its clients.
- D. No management person at EGI has been involved in an arbitration claim or been found liable in a civil or criminal court, self-regulatory organization, or administrative proceeding.
- E. EGI and its management persons do not have a relationship and/or arrangement of any kind with any issuers of securities.

## **Item 20: Additional Information**

### **Privacy**

EGI is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us by both prospects and clients. The categories of nonpublic information that we collect from clients may include information about a client's personal situation to the extent that it is needed for the money coaching and financial planning process, information about transactions between clients and third parties, and information from consumer reporting agencies, e.g., credit reports. EGI uses this information to assist clients with developing and the implementation of a client's financial plan. With a client's permission, EGI will disclose limited information to attorneys, accountants, and mortgage lenders and to whom ever a client has an established relationship. EGI shares limited amounts of information about clients with service providers, such as the custodian of clients account, so that we may enhance the service level provided to clients. EGI maintains a secure location for the storage of client information. EGI employs a firewall, secure



data encryption techniques and authentication procedures on our computer network and cloud providers. We will never provide a client's personal information to mailing list vendors, solicitors and/or third parties of any kind. We require strict confidentiality in our agreements with unaffiliated third parties that require access to a client's personal information, including financial service firms, consultants and auditors. Federal and state securities regulators may review our company records and client's personal records as permitted by law. Personal information about clients will be maintained for the required period. Thereafter, records are required to be maintained by federal and state securities laws. After that time, information will be either destroyed or returned to the client. EGI will notify clients in advance if the EGI privacy policy were to change. We are required by law to deliver this Privacy Notice to clients annually, in writing.

### **Business Continuity Plan (BCP)**

EGI has created a written BCP that is available to clients and prospects upon request. A written BCP helps in identifying procedures relating to an emergency or significant business disruption, including death or incapacitation of the investment adviser or any of its representatives. Such procedures are in place to help EGI's IARs meet their existing fiduciary obligations to their clients.

### **Conflicts of Interest Disclosure**

EGI discloses all material conflicts of interest prior to a client signing the EGI Investment Advisory Agreement. This is done verbally and through EGI's ADV Brochures Part 2A & 2B, EGI's Conflict of Interest Disclosure document and the EGI Advisory Agreement.