PART 2A APPENDIX 1 OF FORM ADV: *WRAP FEE PROGRAM BROCHURE*

EGGERT FINANCIAL MANAGEMENT, INC.
Cultivating Wealth, Shaping Legacies

This brochure provides information about the qualifications and business practices of Eggert Financial Management, Inc. If you have any questions about the contents of this brochure, please contact us at (303) 414-0400 or by email at: info@eggertfinancial.net. 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 Eggert Financial Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Eggert Financial Management, Inc.'s CRD number is: 112025.

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Item 2: Material Changes

The following are material changes since the annual Wrap Fee Brochure dated 2/21/2018:

- Assets under management have changed – see Page 6.

Item 3: Table of Contents

Item 4: Services Fees and Compensation

Eggert Financial Management, Inc. (hereinafter "EFM") offers the following services to advisory clients:

A. Description of Services

Portfolio Management Services

EFM offers portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EFM creates an Investment Policy Statement for each client, which outlines the client's current situation. Portfolio management services include, but are not limited to, the following:

- **Investment strategy**
- **Asset allocation**
- **Risk tolerance**
- **Personal investment policy**
- **Asset selection**
- **Regular portfolio monitoring**

EFM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. EFM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

EFM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of EFM's economic, investment or other financial interests. To meet its fiduciary obligations, EFM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, EFM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is EFM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Investment Portfolios Offered by Eggert Financial Management, Inc.

Adaptive Allocation

The Adaptive Allocation models managed by Eggert Financial Management, Inc. will utilize up to 15 investment positions to create a diversified investment portfolio. Positions are selected to cover most major global markets, asset classes and market capitalizations. In addition to broad diversification, the strategy dynamically raises or lowers cash exposure as a percentage of the total asset base as determined by a quantitative risk management process. The portfolio has the freedom to be invested from 100% cash to 100% equities, depending on conditions in the quantitative risk management environment.

Three Options:

AA 60 – Maximum equity exposure 60% of account value
AA 80 – Maximum equity exposure 80% of account value
AA 100 – Maximum equity exposure 100% of account value

Primary Investment Objective: Moderate Growth
Secondary Investment Objective: Asset Protection with Dynamic Cash Management

- Equity Portfolio

The Equity Portfolio model managed by Eggert Financial Management, Inc. utilizes an analytical ranking/screening algorithm to help identify the highest ranked stocks in ten sectors and invests in these identified stocks. Market signals are reviewed on a weekly basis. The general overall allocation is 96% in individual stocks and 4% cash. The portfolio has the freedom to be invested from 100% cash to 100% equities depending on the quantitative risk management environment.

Primary Investment Objective: Growth
Secondary Investment Objective: Capital preservation in downtrends

Asset management fees are based on the following schedule, and are not negotiable:

Adaptive Allocation Strategy Portfolios:

Total Assets Under Management	Annual Fee
$100,000 - $500,000	1.75%
Plus, On Amounts Over $500,000	1.60%

Fees are charged on the aggregate household amounts invested in the Adaptive Allocation strategy portfolios.

Individual Equity Strategy Portfolios:

Total Assets Under Management	Annual Fee
$200,000 - And Up	2.25%

There is an account minimum of $200,000, which may be waived by EFM in its discretion. The amounts in these portfolios do not aggregate with Adaptive Allocation portfolios for lower fees.

Premier Adaptive Allocation Strategy Portfolios:

Total Assets Under Management	Annual Fee
$1,250,000 - And Up	1.25%

There is an account minimum of $1,250,000, which may be waived by EFM in its discretion. The amounts in these portfolios do not aggregate with Adaptive Allocation portfolios for lower fees.

The final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of EFM's fees within five business days of signing the Investment Advisory Contract. Thereafter, all asset management agreements require 30 day written notice of cancellation.

Fee assessments are collected by EFM on a quarterly basis in advance and are based on account asset value on the last business day of the prior quarter. Fees are prorated upon opening or closing an account with a prorated refund made on account closings with proper written notification.

Asset-based portfolio management fees are typically billed directly to the Custodian (with an informational copy of the invoice to Client) and deducted by the Custodian from the Account with client's written authorization on a quarterly basis. Fees are paid in advance.

Clients receive an invoice from EFM showing the fee calculation concurrent with the custodian deducting fees. Clients receive a statement from custodian showing fee deduction. In order to receive a lower fee, clients may aggregate accounts by household for fee calculation. Account aggregation is only for clients in Adaptive Allocation Portfolios.

EFM collects fees in advance. If client cancels a contracted service, Client will be due a prorated refund. For financial planning the refund is based on time committed to the development of client's financial plan up to the point of termination multiplied by EFM's hourly consultation fee.

For all asset based fees paid in advance, refunds will be prorated. A prorated refund will be based on the number of days left in the quarter, the date of receipt of the cancellation notice plus 30 days. Clients may terminate their contracts with no penalty, fee, or cost, for full refund, within 5 business days of signing the advisory contract. Thereafter, refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

B. Contribution Cost Factors

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

C. Additional Fees

Clients who participate in the wrap fee program will not have to pay for transaction or trading fees. However, clients are still responsible for all other account fees, such as annual IRA fees to the custodian, transition fees if the account is moved to another broker, or mutual fund fees.

D. Compensation of Client Participation

Neither EFM, nor any representatives of EFM receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, EFM may have a financial incentive to recommend the wrap fee program to clients.

Item 5: Account Requirements and Types of Clients

EFM generally provides its wrap fee program services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Corporations and Business Entities

Minimum Account Size

Account minimums apply to clients in Premier Adaptive Allocation Strategy Portfolios and Individual Equity Strategy Portfolios.

Item 6: Portfolio Manager Selection and Evaluation

A. Selecting/Reviewing Portfolio Managers

EFM will not select any outside portfolio managers for management of this wrap fee program. EFM will be the sole portfolio manager for this wrap fee program.

1. Standards Used to Calculate Portfolio Manager Performance

EFM will use industry standards to calculate portfolio manager performance.

2. Review of Performance Information

EFM reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed quarterly and is reviewed by EFM.

B. Related Persons

EFM is both portfolio manager and sponsor of this wrap fee program. This presents a conflict of interest in that EFM pays transaction costs out of its own funds, and has a financial incentive to minimize trading activity to save transaction costs in wrap fee accounts. This conflict of interest is mitigated by the following:

- EFM applies the same trading algorithms to wrap fee and non-wrap fee clients.
- As a fiduciary, EFM is required by law and regulation to put client interests ahead of its own.
- EFM has adopted a Code of Ethics (See Item 9.B) mandating that client interest be place first.

C. Advisory Business

EFM offers portfolio management services to its wrap fee program participants as discussed in Section 4 above.

Wrap Fee Portfolio Management

EFM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EFM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation.

Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy • Personal investment policy
- Asset allocation • Asset selection
- Risk tolerance • Regular portfolio monitoring

EFM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Performance-Based Fees and Side-By-Side Management

EFM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Services Limited to Specific Types of Investments

EFM generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs and non-U.S. securities, although EFM primarily recommends adaptive - tactical asset allocation to a majority of its clients. EFM may use other securities as well to help diversify a portfolio when applicable.

Client Tailored Services and Client Imposed Restrictions

EFM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Wrap Fee Programs

EFM sponsors and acts as portfolio manager for this wrap fee program. EFM manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than non-wrap fee. The fees paid to the wrap account program will be given to EFM as a management fee.

Amounts Under Management

EFM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$51,595,627	$14,263,283	12/31/2018

Methods of Analysis and Investment Strategies

EFM's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis and quantitative analysis.

Charting analysis involves the use of patterns in performance charts. EFM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Technical analysis involves the analysis of past market data; primarily price and volume.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

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. EFM uses long term trading and short term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized

EFM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Voting Client Proxies

EFM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 7: Client Information Provided to Portfolio Managers

EFM is the portfolio manager for this wrap fee program. All client information that is collected, including basic information, risk tolerance, sophistication level, and income level will be collected by EFM. As that information changes and is updated, EFM will have immediate access to that information once collected.

Item 8: Client Contact with Portfolio Managers

EFM places no restrictions on client ability to contact its portfolio managers. EFM's representative, William H Eggert can be contacted during regular business hours and contact information is on the cover page of William H Eggert's Form ADV Part 2B brochure supplement.

Item 9: Additional Information

A. Disciplinary Action and Other Financial Industry Activities

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-regulatory Organization Proceedings

There are no self-regulatory organization proceedings to report.

Registration as a Broker/Dealer or Broker/Dealer Representative

As a registered representative of Colorado Financial Service Corporation, Ronald William Manning accepts compensation for the sale of securities.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither EFM nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

William Hartwell Eggert is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. EFM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of EFM in connection with such individual's activities outside of EFM.

Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

EFM will direct clients to third party money managers. EFM will be compensated via a fee share from the advisors to which it directs those clients. This relationship will be disclosed in each contract between EFM and each third party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that EFM has an incentive to direct clients to the third party money managers that provide EFM with a larger fee split. EFM will always act in the best interests of the client, including when determining which third party manager to recommend to clients. EFM will ensure that all recommended advisors or managers are licensed or notice filed in the states in which EFM is recommending them to clients.

B. Code of Ethics, Client Referrals, and Financial Information

Code of Ethics

EFM has a written Code of Ethics that covers the following areas:

Prohibited Purchases and Sales
Compliance Procedures
Insider Trading
Personal Securities Transactions
Exempted Transactions
Prohibited Activities
Conflicts of Interest
Gifts and Entertainment
Confidentiality
Service on a Board of Directors

Compliance with Laws and Regulations
Procedures and Reporting
Certification of Compliance
Reporting Violations
Compliance Officer Duties
Training and Education
Recordkeeping
Annual Review
Sanctions

EFM will always act in the best interest of the client; including the sale of commissionable products to advisory clients. EFM will do everything to mitigate conflicts of interest by disclosing to the client any conflict of interest.
ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE OUR CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK YOUR FINANCIAL ADVISER AT ANY TIME.

Recommendations Involving Material Financial Interests

EFM does not recommend that clients buy or sell any security in which a related person to EFM or EFM has a material financial interest.

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of EFM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of EFM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. EFM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of EFM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of EFM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, EFM will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for EFM's advisory services provided on an ongoing basis are reviewed at least quarterly by William H Eggert, President with regard to clients' respective investment policies and risk tolerance levels. All accounts at EFM are assigned to this reviewer.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

EFM may receive compensation from third-party asset managers to which it directs clients.

Compensation to Non - Advisory Personnel for Client Referrals

EFM does not pay non-advisory personnel for client referrals.

Balance Sheet

EFM does not require nor solicit prepayment of more than $500 in fees per client, six months or more in advance and has not included a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither EFM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

EFM has not been the subject of a bankruptcy petition in the last ten years.

Item 10: Requirements for State Registered Advisers

Material Relationships (If Any) With Issuers of Securities

Neither EFM, nor its management persons, has any relationship or arrangement with issuers of securities.