

FIRM BROCHURE – FORM ADV PART 2A

Item 1: Cover Page



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 last annual brochure dated 2/21/2018:

- Item 4: Advisory Business has been updated to reflect current assets under management have changed.
- Item 4: Advisory Business has been updated to remove the discontinued Calendar Effects model.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Eggert Financial Management, Inc. (hereinafter "EFM") is a Corporation organized in the State of Colorado.

The firm was formed in January 1988, and the principal owner is William Hartwell Eggert.

B. Types of Advisory Services

FINANCIAL PLANNING & CONSULTING SERVICES

EFM offers various financial planning and consulting services for a fee. EFM will gather financial information and history from the client including but not limited to, clients' current financial status, future goals and attitudes towards risk, investment objectives, investment horizon, financial needs, cost of living needs, education needs, savings tendencies, and other applicable financial information required by EFM in order to provide the investment advisory services requested. Based upon client's needs, EFM will prepare a written financial plan or summary of recommendations.

Generally, financial planning and consulting services are offered in the following areas:

- Personal: Family records, budgeting, personal liability, estate information and financial goals.
- Tax & Cash Flow: Income tax and spending analysis and planning for past, current, future years. EFM will illustrate the impact of various investments on a client's current income tax and future tax liability.
- Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Investments: analysis of investment alternatives and their effect on a client's portfolio.

Financial planning services are based on the client's financial situation at the time and are based on financial information disclosed by the client to EFM. Clients are advised certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. EFM cannot offer any guarantees or promises that client's financial goals and objectives will be met. Further, client must continue to review any plan and update the plan based upon changes in the client's financial situation, goals, or objectives or changes in the economy. Should client's financial situation or investment goals or objectives change, clients must notify EFM promptly of the changes. Should client choose to implement the recommendations and investment advice contained in the plan or report, EFM suggests client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of recommendations and advice is entirely at the client's discretion.

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

COMBO 3

The Combo 3 model managed by Eggert Financial Management, Inc. will generally be invested in 3 positions at any time – through the use of specific mutual funds. The Combo 3 model strategy uses 3 market based signals to direct trades within the model. Some of the funds used in this model use leverage to enhance potential returns. Leveraged funds can cause more than market losses in a down market. All three market signals are reviewed on a weekly basis. This portfolio can experience a large number of trades as it can be traded on a weekly basis. This portfolio is suited for tax deferred accounts only. This portfolio will lack the diversification of a traditional asset allocation type account. The portfolio has the freedom to be invested from 100% cash to 100% equities and up to 67% in market inverses, depending on conditions in the quantitative risk management environment.

Primary Investment Objective: Risk Managed Maximum Growth

Secondary Investment Objective: Asset Protection with Dynamic Cash Management

POLICY PORTFOLIO

The Policy Portfolio model managed by Eggert Financial Management, Inc. will utilize up to 10 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 risk management process in the Policy Portfolio is based in longer term market cycles and indicators than those generally used in the Adaptive Allocation and Combo 3 models. As a result, money can stay invested for a longer time period, resulting in fewer transactions in the Policy Portfolio model than in the Adaptive Allocation or Combo 3 models. The portfolio has the freedom to be invested from 100% cash to 80% equities/20% fixed income, depending on conditions in the quantitative risk management environment.

Primary Investment Objective: Moderate Growth

Secondary Investment Objective: Asset Protection with Dynamic Cash Management

Third Party Asset Management Services

EFM maintains agreements with a number of third party asset managers who may possess specific management skills that may benefit a client's investment objective. In such cases, EFM will assist the client in selecting a third party money manager that fits the specific client's needs, selecting appropriate portfolio asset allocations, and monitoring that managers performance on behalf of the client and otherwise overseeing the client's investments with the third party manager.

Allocation Alerts Service

EFM provides a subscription based 401k service. On a quarterly basis, EFM produces asset allocation suggestions specific to client 401k plans. Suggestions are based on plan holdings, quantitative calculations on related asset classes, and client risk tolerances. Client is free to follow or disregard advice produced by this service.

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.

C. Client Tailored Services and Client Imposed Restrictions

EFM offers the same suite of services to all of its clients. However, specific client investment strategies 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). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

EFM sponsors a wrap fee program, wherein the investor pays one stated fee that includes management fees and transaction costs. EFM does not manage those wrap fee accounts any differently than non-wrap fee accounts. A portion of the fees paid to the wrap account program will be given to EFM as a management fee. Clients whose initial investment is at least \$100,000 in an ETF-based model, or at least \$200,000 in an equities-based model, qualify for the wrap fee program.

E. Assets 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

Item 5: Fees and Compensation

A. Fee Schedule

FIRST YEAR FINANCIAL PLANNING FEES

The cost for developing a financial plan and first year of service is based on .20% of the client's individual net worth. The minimum financial planning fee is \$2,000.

The financial planning fee can range between \$2,000 and \$50,000. Fees are charged 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

ANNUAL RETAINER FEES

The cost for on-going maintenance is based on a fee of .15% of the client's individual net worth annually after the first year. The minimum on-going maintenance fee will be \$1,500.

HOURLY CONSULTING FEES

EFM charges an hourly rate of \$500 billed in fifteen minute increments. Such hourly billings are payable at the time of service. Hourly Financial Planning fees are paid via check or credit card.

Clients may terminate the agreement without penalty for a full refund of EFM's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

ASSET-BASED FEES FOR PORTFOLIO MANAGEMENT

Asset management fees for all discretionary portfolios described in this brochure are based on the following schedule:

Total Assets Under Management	Annual Fee
On The first \$500,000	1.75%
Amounts > \$500,000	1.60%

For non-discretionary investment advisory services, the following schedule applies:

Total Assets Under Management	Annual Fee
On The first \$500,000	0.75%
On the next \$500,000	0.60%
On amounts over \$1,000,000	0.40%

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

For accounts under \$100,000 the client is responsible for any transaction and account fees incurred in the course of executing transactions. EFM does not receive any portion of transaction or account fees.

THIRD PARTY ASSET MANAGEMENT SERVICES

Clients will pay an advisory fee to the third party manager for management services based on the third party manager's agreement and fee schedule. EFM will receive a portion of the third party manager's fee paid by the client. Such fees are disclosed to client in the third party manager's disclosure brochure. Clients will enter into an agreement directly with the third party manager selected by the client. Clients should read the third party manager's disclosure brochure thoroughly prior to entering into any advisory agreement.

EFM's compensation will depend on the third party manager program selected by the client. EFM will receive a portion of the advisory fee charged by the third party manager. EFM does not charge any fees in addition to the fees charged by the third party manager on assets managed by the third party manager.

ALLOCATION ALERTS SERVICE

The Allocation Alerts service is available for a monthly fee of \$39.95 or an annual fee of \$425.00.

Should subscribers want to cancel within the first 60 days, EFM will refund 100% of the subscription fee paid. After the first 60 days, clients are free to cancel service at any time. Monthly subscriptions will run to the end of the month last paid for. Annual subscriptions will receive a pro-rated refund based on the month end of the month the cancellation notice was received. Cancellation may be processed through email notice to EFM.

Fees Are Not Negotiable

B. Payment of Fees

FINANCIAL PLANNING FEES

Financial planning fees are paid via check or credit card.

Financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

EFM may waive the financial planning fee if a client maintains a fee based asset management account with EFM.

ASSET-BASED PORTFOLIO MANAGEMENT FEES

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.

ALLOCATION ALERTS SERVICE

The Allocation Alerts service is typically paid by credit card through an online payment process.

C. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by EFM. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

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.

E. Outside Compensation For the Sale of Securities to Clients

EFM or its supervised persons may accept asset-based service fees from mutual funds.

William Hartwell Eggert is also an insurance agent. In this role, he accepts compensation for the sale of insurance products to EFM clients. This presents a conflict of interest and gives an incentive to recommend products based on the compensation received rather than on the client's needs. EFM has a fiduciary duty always to act in the client's best interest, regardless of compensation that may be received by the firm.

CLIENTS HAVE THE OPTION TO PURCHASE RECOMMENDED PRODUCTS FROM OTHER BROKERS

Clients always have the option to purchase EFM recommended products through other brokers or agents that are not affiliated with EFM.

COMMISSIONS ARE NOT THE PRIMARY SOURCE OF INCOME FOR EFM

Commissions are not EFM's primary source of compensation.

ADVISORY FEES IN ADDITION TO COMMISSIONS OR MARKUPS

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

Item 6: 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.

Item 7: Types of Clients

EFM generally provides advisory 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 in the separate Wrap Fee Program.

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

A. Methods of Analysis and Investment Strategies

METHODS OF ANALYSIS

EFM's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis and quantitative analysis. Eggert Financial Management, Inc. utilizes a variety of resources in managing investment portfolios. EFM subscribes to numerous asset management services that provide research, fund/investment selection, asset allocations and model portfolios. EFM also incorporates the use of analytical computer programs to help determine appropriate investment allocations. The data from these services and programs is reviewed by EFM and applied to the 5 portfolio options EFM offers its clients.

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.

INVESTMENT STRATEGIES

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.

B. Material Risks Involved

METHODS OF ANALYSIS

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.

INVESTMENT STRATEGIES

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

None of the accounts, models, portfolios or investments used in the accounts managed by Eggert Financial Management, Inc. are guaranteed against loss. All models incorporate risk management through raising and lowering stock market exposure determined through the use of various rules. Such rules will indicate potential changes in market direction which will then lead to either increasing or decreasing stock market exposure. There is no assurance that such indicators or rules will be 100% correct at any point in time. Decreasing stock market exposure can reduce both portfolio volatility and rate of return.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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 Advisers or Managers and How This Adviser is Compensated for Those Selections

EFM may direct clients to third-party investment advisers. EFM will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized 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 investment advisers 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 investment adviser to recommend to clients. EFM will ensure that all recommended advisers are licensed or notice filed in the states in which EFM is recommending them to clients.

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

A. Code of Ethics

EFM has a written Code of Ethics and a Policies and Procedures Manual 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.

B. 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.

C. 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.

D. 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 if representatives of EFM buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on EFM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and EFM may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in EFM's research efforts. EFM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Currently EFM will recommend clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC/NFA.

1. RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

While EFM has no formal soft dollars program in which soft dollars are used to pay for third party services, EFM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). EFM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and EFM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. EFM benefits by not having to produce or pay for the research, products or services, and EFM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that EFM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. BROKERAGE FOR CLIENT REFERRALS

EFM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE

EFM may permit Clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing that the Client's direction with respect to the use of brokers supersedes any authority granted to EFM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless EFM is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If EFM buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, EFM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. EFM would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All financial planning accounts are reviewed upon financial plan creation and plan delivery by William H Eggert, President. Financial plans are typically reviewed at least annually.

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.

There is only one level of review for subscription services, which is EFM's review prior to rendering the subscription advice.

EFM reviews general recommendations for the Allocation Alerts service on a quarterly basis.

B. 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).

C. Content and Frequency of Regular Reports Provided to Clients

Clients of EFM's asset management service will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. Custodians typically provide account statements at least quarterly.

EFM does not provide reports relating to its subscription services.

Generally each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. 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.

B. Compensation to Non – Advisory Personnel for Client Referrals

EFM may enter into written arrangements with third parties to act as solicitors for EFM's investment management services. Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. EFM will ensure each solicitor is exempt, notice filed, or properly registered in all appropriate jurisdictions.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, EFM will be deemed to have limited custody of client's assets and must have written authorization from the client to do so.

Clients will receive account statements from their respective custodian, plus billing invoices, other reports, and account analyses from EFM. Clients should carefully review and compare all statements, invoices, and other reports for accuracy.

Item 16: Investment Discretion

Typically EFM provides investment advisory services on a discretionary basis. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, EFM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. EFM may also provide investment advisory services on a nondiscretionary basis.

Item 17: Voting Client Securities (Proxy Voting)

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 18: Financial Information

EFM neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance.

Neither EFM nor its management has any financial condition that is likely to reasonably impair EFM's ability to meet contractual commitments to clients.

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

Item 19: Requirements for State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business backgrounds of William Hartwell Eggert can be found on the Form ADV Part 2B brochure supplement at the end of this document.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

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.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

FORM ADV PART 2B – William H. Eggert



EGGERT FINANCIAL MANAGEMENT, INC.
Cultivating Wealth, Shaping Legacies

William Hartwell Eggert

7200 S. Alton Way, Suite A-210 Centennial, CO 80112 303-414-0400

This brochure supplement provides information about **William Hartwell Eggert** that supplements Eggert Financial Management Inc.'s brochure. You should have received a copy of the brochure. Please contact the firm if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about William Hartwell Eggert is available on the SEC's website at www.adviserinfo.sec.gov.

2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name:

William Hartwell Eggert

Year of Birth:

1959

Formal Education: (formal education after high school):

- University of Colorado - Boulder, CO BS - Finance, 1981

Business Background (preceding five years):

- 1988 to present - Eggert Financial Management, Inc.
 - President, Owner
 - Investment Adviser Representative (IAR)
- 2011 to 2017 - Colorado Financial Service Corporation.
 - Registered Representative
 - Registered Principal
- 2003 - 2011 - MCL Financial Group
 - Registered Representative
 - Registered Principal
 - OSJ Branch Manager

3. DISCIPLINARY INFORMATION

William Hartwell Eggert has no disciplinary events to disclose.

4. OTHER BUSINESS ACTIVITIES

Eggert is licensed to sell insurance related products, such as life, health and fixed annuities. Eggert spends less than 10% of his working hours for this activity.

In addition to the advisory fees paid to EFM, Eggert also receives insurance commissions.

5. ADDITIONAL COMPENSATION

When Eggert attends seminars or training and educational conferences sponsored by third party product or service providers, costs of attending such events will be reimbursed by the product or service provider. In addition for reimbursement of attending events sponsored by third party product or services providers, Eggert can receive promotional items, meals or entertainment or other non-cash compensation from the sponsor as permitted by regulatory rules and internal policies and procedures.

6. SUPERVISION

As the only owner and representative of EFM, William Hartwell Eggert supervises all duties and activities of the firm. His contact information is on the cover page of this disclosure document. William Hartwell Eggert adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

7. REQUIREMENTS FOR STATE REGISTERED ADVISERS

A. William Hartwell Eggert has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. William Hartwell Eggert has NOT been the subject of a bankruptcy petition in the past ten years.

FORM ADV PART 2B – Ronald W. Manning



EGGERT FINANCIAL MANAGEMENT, INC.
Cultivating Wealth, Shaping Legacies

7200 S. Alton Way, Suite A-210 Centennial, CO 80112 303-414-0400

Ronald William Manning
32065 Castle Ct Suite 300, Evergreen CO 80439
303-674-8836

This brochure supplement provides information about **Ronald William Manning** that supplements Eggert Financial Management Inc.'s brochure. You should have received a copy of the brochure. Please contact the firm if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Ronald William Manning is available on the SEC's website at www.adviserinfo.sec.gov.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name:

Ronald William Manning

Year of Birth:

1958

Formal Education: (formal education after high school):

- Kansas State University, Manhattan, KS, B.S. Accounting, 1980

Business Background (preceding five years):

- 2011 to Present – Eggert Financial Management, Inc.
 - Investment Adviser Representative (IAR)
- 2011- 2017 - Colorado Financial Service Corporation.
 - Registered Representative
 - Registered Principal
- 2001 - 2011 - MCL Financial Group
 - Registered Representative
 - Registered Principal

3. DISCIPLINARY INFORMATION

Any disciplinary event that is not disclosed in this section or additional information about Ronald William Manning can be found on FINRA's BrokerCheck at www.finra.org/brokercheck, or the IAPD at www.adviserinfo.sec.gov.

4. OTHER BUSINESS ACTIVITIES

Manning is an Investment Adviser Representative (IAR) of Eggert Financial Management, Inc., a Registered Investment Advisory firm. In his capacity as an IAR, Manning provides investment management services to his clients as described in Part A of this brochure. Manning spends 35% of his working hours providing these services to his clients.

5. ADDITIONAL COMPENSATION

When Manning attends seminars or training and educational conferences sponsored by third party product or service providers, costs of attending such events will be reimbursed by the product or service provider. In addition, for reimbursement of attending events sponsored by third party product or services providers, Manning can receive promotional items, meals or entertainment or other non-cash compensation from the sponsor as permitted by regulatory rules and internal policies and procedures.

6. SUPERVISION

As a representative of EFM, Ronald William Manning works closely with the supervisor, William Hartwell Eggert, and all advice provided to clients is reviewed by the supervisor prior to implementation. William Hartwell Eggert's phone number is (303) 414-0400.

7. REQUIREMENTS FOR STATE REGISTERED ADVISERS

A. Ronald William Manning has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Ronald William Manning has NOT been the subject of a bankruptcy petition in the past ten years.