

**Item 1 – Introduction**

Aegis Wealth Group, LLC (dba Everspire and e6Portfolios) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Investor.gov/CRS provides free and simple tools to research financial firms and professionals as well as educational materials about broker-dealers, investment advisers, and investors.

**Item 2 – Relationships and Services*****What investment services and advice can you provide to me?***

**Aegis Wealth Group, LLC /dba Everspire** offers services to retail investors, including individuals, high net worth clients, and businesses:

- **Wealth Management / Dedicated Advisor:** We evaluate your financial situation, determine your objectives and risk tolerance, and propose an investment strategy. As part of our standard service we monitor that strategy on an ongoing basis, including an annual review and ongoing availability for consultation.
- **Financial Planning:** For some legacy clients we gather information about your finances and goals, establish metrics for success, and prepare and maintain a personalized financial plan for you. New clients who seek Financial Planning will be referred to TomiPlan, an affiliated firm (see Item 3 – Conflicts of Interest below).

**Aegis Wealth Group /dba e6Portfolios** offers investment management to retail and institutional investors:

- **Investment Management / Unified Managed Account Services (UMA):** We analyze market conditions and investment options, construct model portfolios, implement them in your account(s), and monitor your portfolio. We also manage accounts for tax efficiency, rebalance across multiple accounts when necessary and provide cash management (UMA services). These services are offered on a discretionary basis, which means that you grant us limited authority to buy and sell investments without us asking for authorization each time.
- **Wrap Fee Program (e6Portfolios):** Our investment management services are also offered through a Wrap Fee program, which means you do not pay trading costs. Wrap clients must use a recommended custodian.
- **Limited Investment Offerings:** We can advise on any asset, but we primarily recommend mutual funds, ETFs, and individual stocks in our model portfolios.
- **Account Minimums:** Our Financial Planning, advisory, and investment services do not have a formal minimum, but we will consider relationship size before agreeing to work with you.

**Additional information:** Please see Items 4 and 7 of our Form ADV, Part 2A (“Firm Brochure”) or Items 4 and 5 of our Form ADV, Part 2A Appendix 1 (“Wrap Brochure”), both accessible by visiting [everspire.com/form-adv/](https://everspire.com/form-adv/).

**Item 3 – Fees, Costs, Conflicts, and Standard of Conduct*****What fees will I pay?***

**Fees:** Everspire and e6Portfolios both charge you a percentage of the assets that we manage for you. This fee is calculated and charged at the end of each month and deducted from your account. The more assets there are in your accounts, the more you will pay in fees, so we have an incentive to increase your assets with us.

**Wrap Fee Program (e6Portfolios):** We pay all transaction costs charged by your account custodian in our Wrap Fee Program. It is possible that you might pay more in our Wrap Fee Program than you would for a comparable non-wrap service in which you pay a lower management fee but pay all trading costs yourself.

**Other Fees and Costs:** Client accounts are subject to other expenses not under the control of the adviser, including custodial charges as well as investment management fees and other fees charged by ETFs, money market funds, or mutual funds that you own in your account.

**Conversation Starters –  
Ask your financial professional:**

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

**Conversation Starters –  
Ask your financial professional:**

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

**Additional Information.** You will pay fees and costs whether you make or lose money on your investments. Fees and costs reduce any amount of money you make on your investments over time. Make sure you understand what fees and costs you are paying. See our Firm Brochure (Item 5) or Wrap Brochure (Item 4) by visiting [everspire.com/form-adv/](https://everspire.com/form-adv/).

***What are your legal obligations to me when acting as my investment adviser?  
How else does your firm make money and what conflicts of interest do you have?***

**Conflicts of Interest:** When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money sometimes creates conflicts. You should understand these conflicts and ask us about them because they can affect the investment advice we provide you.

Here is an example to help you understand what this means. The custodians we recommend provide you access to a wide range of investments, but they also offer Everspire resources that help us develop our business. These resources play a part in our choice of custodians. We address this conflict of interest by vetting our custodians, disclosing conflicts of interest, and providing clients a choice of custodians.

For additional information on these conflicts of interest please see our Firm Brochure (Items 5, 10, 11, and 12) and Wrap Brochure (Item 9) available at [everspire.com/form-adv/](https://everspire.com/form-adv/).

***How do your financial professionals make money?***

We benefit from the advisory fees we receive from you. Our financial professionals receive a portion of that revenue as compensation, so they have an incentive to increase the assets they manage.

Everspire and e6Portfolios do not receive commissions from clients. However, some of our financial professionals are also registered representatives of MHL Investments, the Firm's affiliated FINRA broker-dealer. These registered representatives can recommend commission-based products, for which they receive compensation. Some of our financial professionals also recommend insurance products through MHL for which they receive commission-based compensation. As a result, they have an incentive to solicit commission-based products based on the compensation received. MHL is an affiliate of Everspire and their Customer Relationship Summary can be found by visiting FINRA's [BrokerCheck](#).

Our financial professionals recommend TomiPlan, an affiliated firm, to clients interested in Financial Planning services provided on a subscription basis. Since it is an affiliated firm under shared ownership, we benefit when clients use TomiPlan for Financial Planning. Our advisors receive compensation from TomiPlan for referring clients. One of our financial professionals is also a CPA, so we are affiliated with his firm, Carefree Professional Practice Resources, LLC. Everspire addresses conflicts of interest created by these affiliations by disclosing the conflicts and not requiring that our clients use of these affiliates.

**Additional information.** For additional information on these and other conflicts of interest please see our Firm Brochure (Items 5, 10, 11, and 12) and Wrap Brochure (Item 9) by visiting [everspire.com/form-adv/](https://everspire.com/form-adv/).

**Item 4 – Disciplinary History**

***Do you or your financial professionals have legal or disciplinary history?***

No, we do not have any legal or disciplinary events to report. For additional information see our Firm Brochure (Item 9), Wrap Brochure (Item 9), or Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free search tool to research us and our financial professionals.

**Item 5 – Additional Information**

For additional information on our advisory services, see our Firm and Wrap Brochure available at [everspire.com/form-adv/](https://everspire.com/form-adv/) or by visiting our [Investment Adviser Firm Summary](#). If you have questions, need additional information, or want a copy of this Client Relationship Summary, please contact us at 801-545-8706.

**Conversation Starters –  
Ask your financial professional:**

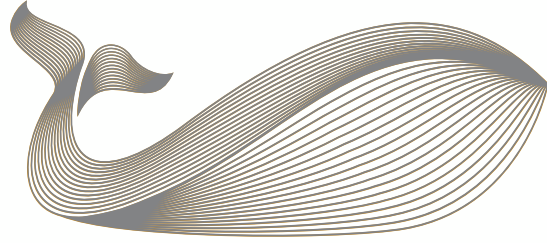
- How might your conflicts of interest affect me, and how will you address them?

**Conversation Starters –  
Ask your financial professional:**

- As a financial professional, do you have any disciplinary history? For what type of conduct?

**Conversation Starters –  
Ask your financial professional:**

- Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer?



# E V E R S P I R E

## Client Brochure

(Form ADV Part 2A)

March 9, 2023

This brochure provides information about Everspire's qualifications and business practices. If you have questions about the brochure, please contact us at [hello@everspire.com](mailto:hello@everspire.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration does not imply a certain level of skill or training. Provision of this brochure does not relieve Everspire of any other disclosure obligations the firm may have under federal or state law. Additional information about Everspire is available by searching the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by firm name or CRD number (#222515).

**6900 S. 900 E. Suite 200, Midvale, UT 84047**

**[www.everspire.com](http://www.everspire.com) | 801-545-8706**

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ITEM 2 – MATERIAL CHANGES

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This document summarizes material changes to Everspire’s ADV Part 2A (Firm Brochure) since the previous update (November 2022). Clients receive a summary of changes within 120 days of year-end and whenever the firm’s practices change materially. A full copy of Everspire’s most recent brochure may be requested at any time by contacting Roy Jones at 801-545-8706 or [hello@everspire.com](mailto:hello@everspire.com) or by searching the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by firm name or CRD number (#222515).

**Everspire Affiliates:** Items 4 and 10 of our Firm Brochure has been updated to disclose new Everspire affiliates. First, Everspire now refers clients wishing to receive Financial Planning to TomiPlan. TomiPlan offers Financial Planning on a subscription basis. The firm is affiliated with Everspire through shared ownership, so the subscriptions that clients pay to TomiPlan benefit Everspire. Everspire advisors also receive compensation for referring their clients to TomiPlan.

Second, Everspire is now affiliated with Carefree Professional Practice Resources, LLC, a CPA firm, because the owner, Nathan Rockwell, CPA, is one of Everspire’s Investment Advisor Representatives.

ITEM 3 – TABLE OF CONTENTS

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<b>ITEM 2 – MATERIAL CHANGES</b>	<b>2</b>
<b>ITEM 3 – TABLE OF CONTENTS</b>	<b>3</b>
<b>ITEM 4 – ADVISORY BUSINESS</b>	<b>4</b>
<b>ITEM 5 – FEES AND COMPENSATION</b>	<b>6</b>
<b>ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT</b>	<b>8</b>
<b>ITEM 7 – TYPES OF CLIENTS</b>	<b>8</b>
<b>ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS</b>	<b>8</b>
<b>ITEM 9 – DISCIPLINARY INFORMATION</b>	<b>10</b>
<b>ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS</b>	<b>10</b>
<b>ITEM 11 – ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING</b>	<b>11</b>
<b>ITEM 12 – BROKERAGE PRACTICES</b>	<b>12</b>
<b>ITEM 13 – REVIEW OF ACCOUNTS</b>	<b>14</b>
<b>ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION</b>	<b>14</b>
<b>ITEM 15 – CUSTODY</b>	<b>14</b>
<b>ITEM 16 – INVESTMENT DISCRETION</b>	<b>15</b>
<b>ITEM 17 – VOTING CLIENT SECURITIES</b>	<b>15</b>
<b>ITEM 18 – FINANCIAL INFORMATION</b>	<b>15</b>

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## ITEM 4 – ADVISORY BUSINESS

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### **About Everspire**

Aegis Wealth Group, LLC was founded on October 25, 2005 by owners Roy Jones and Joshua Jones and registered as an independent RIA in 2015. Aegis has used the /dba “Everspire” since 2016 and is organized as a Limited Liability Company in the state of Utah.

As of February 9, 2023, Aegis Wealth Group, LLC managed \$95,400,000 in discretionary assets and \$0 in non-discretionary assets.

Everspire provides the following services to meet individual client retirement needs:

- 1. Wealth Management / Dedicated Advisor**
- 2. Financial Planning**

### **Wealth Management / Dedicated Advisor**

A dedicated advisor will work with the client to analyze current investments, determine investment objectives and risk tolerance, and gather other relevant information about the client. The advisor will use this suitability information to research investment options, develop an investment strategy and risk score for the client, and then recommend a wrap program or other investment manager to implement the strategy. The advisor then monitors the wrap fee program or investment manager and provides periodic reporting. The advisor will be available to the client for consultation and advice and will offer to conduct a comprehensive wealth management review annually to evaluate the client’s current approach and recommend any advisable changes.

As part of this advisory service, advisors may help clients complete paperwork, research solutions, add discipline, increase entrepreneurship, improve processes, think creatively, add skill, and help the client implement a financial plan if one is in place. Advisors often coordinate and monitor progress with legal, accounting, tax, and other outside professionals; refer clients to needed services; remind clients of tasks and goals; provide debt management guidance; work to make the most of qualified plans; keep clients informed of opportunities and areas of concern; and act in other areas to promote positive outcomes.

### **Financial Planning**

In the past, Everspire has provided Financial Planning to some of its clients. The firm continues to provide this service to some clients on a legacy basis. For new clients wishing to receive Financial Planning, Everspire refers clients to TomiPlan, an affiliated financial planning company that offers Financial Planning on a subscription basis. Because TomiPlan is affiliated due to shared ownership, the subscriptions that clients pay to TomiPlan benefit Everspire. Everspire advisors also receive compensation for referring clients to TomiPlan.



For legacy Financial Planning clients, Everspire’s approach is modelled on the process published by the Financial Planning Standards Board. It is a goals-based, liability-driven strategy, which means that recommendations are based on estimating the cash flows needed to fund future liabilities (needs in retirement, liquidity requirements, etc) and preparing clients to meet future needs with the highest possible degree of probability.

Everspire advisors gather financial data; evaluate the client’s individual needs, objectives, and risk tolerance; establish metrics for assessing progress; apply reasonable assumptions about inflation and expected return; and maintain a financial plan on an ongoing basis. Everspire’s planning software continuously updates these assumptions and the advisor communicates with the client to adjust the plan in response to changing needs and economic conditions. The accuracy of the plan depends on information supplied by the client. Clients have ongoing access to their financial plan and to Everspire’s planning technology for continuing guidance and evaluation of progress towards their financial goals.

### **Wrap Fee Program**

Aegis Wealth Group, LLC sponsors a Wrap Fee Program under the name **e6Portfolios**. Everspire advisors recommend the e6Portfolios Wrap Fee Program to clients. Because e6Portfolios is affiliated with Everspire, Everspire benefits from compensation received by e6Portfolios. Details of the Wrap program are disclosed in the e6Portfolios Wrap Fee Program Brochure. Clients enrolled in Wrap Fee programs do not pay transaction expenses for accounts enrolled in the program, resulting in a lower overall cost for the client. Clients not enrolled in the Wrap Fee program are generally invested in the same portfolio models offered by the Wrap Fee program but must pay trading commissions incurred in their account. Advisors at Everspire do not receive additional compensation for recommending clients to e6Portfolios.

### **Investment Discretion**

Everspire clients may or may not grant the firm discretionary trading authority and they should consult their advisory agreement to determine whether discretion is granted. Clients who do grant Everspire discretion give the firm authority to buy and sell publicly traded investments on behalf of the client in order to implement the investment model and risk score agreed upon with their advisor (see Item 16). In their agreements executed with the qualified custodian, the client authorizes the custodian to follow Everspire’s instructions concerning trading and other investment activity in the account on behalf of the client. Clients who participate in the e6Portfolios Wrap Program are required to grant e6Portfolios discretionary trading authority. Please see the e6Portfolios firm brochure for more information.

Clients may impose reasonable restrictions on the management of their Account and must communicate these restrictions to Everspire in writing. Everspire primarily allocates assets in mutual funds and ETFs and cannot guarantee that a security a client wishes to exclude is not held in a mutual fund that is owned by a Client.



## Termination

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

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### ITEM 5 – FEES AND COMPENSATION

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Everspire clients are assessed a fee calculated as an annual percentage of assets under management according to the following tiered schedule:

#### **Wealth Management / Dedicated Advisor**

	<u>Asset Range</u>	<u>Fee</u>
\$	- to \$ 999,999	1.00%
	1,000,000 to 4,999,999	0.90%
	5,000,000 to 9,999,999	0.70%
	10,000,000 to 24,999,999	0.50%
	25,000,000 to 49,999,999	0.30%
	50,000,000 to 250,000,000	0.20%
	250,000,000 to 999,999,999	0.10%
	1,000,000,000 and above	0.02%

Clients receiving legacy services from Everspire (see Item 4 above) may pay different fees than those stated here. Clients should review their investment management agreements for more information; clients may switch to the new fee schedule by requesting an updated agreement.

#### **Fee Calculation and Manner of Payment**

Asset tiers are calculated and applied based on all assets in the client’s household under management by Everspire. A “Client household” is generally limited to a person or a couple who share finances; Everspire reserves the right determine the members of a client household.

Fees are deducted from client accounts monthly in arrears and are calculated based on the average daily balance of the account during the month. Advisory fees are not collected in advance. The client’s agreements with Everspire and with their qualified custodian provide authorization to deduct management fees from the client’s account directly and remit that fee to the firm. Everspire will send a bill to the qualified custodian indicating the amount of the fee to be paid. The custodian will send a statement to the client, at least quarterly, indicating the





fee dispersed. Each time the fee is assessed, Everspire will make a statement available to the client showing the amount of the fee and how the fee was calculated. Everspire will disclose to clients their responsibility to verify the accuracy of the fee calculation.

Everspire believes that its advisory fees are reasonable but the firm's fees may be more than the cost of purchasing comparable services separately or through other investment advisors. Fees are not negotiable but may be reduced for employees and employee friends and family members; some clients may pay a lower grandfathered rate because of a preexisting advisory agreement. Everspire does not bill on the value of margin debit balances, cash or cash equivalents, unmanaged positions (as agreed with the client), or accrued interest, unless explicitly agreed upon with the client.

### **Other Costs**

Custodians and/or broker-dealers generally charge commissions, transaction fees, custodial costs, and other fees for effecting securities transactions and maintaining client accounts. These charges are separate from Everspire's management fee and are governed by the custodial agreement. Clients participating in the e6Portfolios Wrap Fee Program do not bear commission costs. Non-wrap clients incur transaction costs at a rate they agree to with their account custodian. See Item 12 for more information on Brokerage Practices.

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

### **Margin Costs**

The custodians recommended by Everspire may make margin borrowing available to clients. Everspire does not actively recommend margin borrowing but advisors may discuss the benefits and costs of margin with clients and Everspire may facilitate margin borrowing if the client chooses to use margin. Margin borrowing incurs interest and other costs to the client that vary by custodian and as interest rates change. Everspire does not bill on margin balances and does not receive revenue from custodians related to margin borrowing and therefore has no incentive to recommend margin.

### **Insurance and Broker-Dealer Transactions**

Everspire's Investment Advisor Representatives may be licensed insurance agents capable of recommending various insurance products through third-party relationships with insurance carriers. Everspire Investment Advisor Representatives may be licensed Registered Representatives of a Broker-Dealer (see Items 10 and 12 below).



As Broker-Dealer representatives, Roy Jones, Joshua Jones, Ryan Tucker, Adam Cook, Adam Lazaro, and Thomas Melburn accept asset-based charges for the sale of alternative investments that are not publicly traded. They may receive service fees from mutual funds and annuities. This represents a conflict of interest because it may create an incentive to recommend products based on the compensation received, rather than on the client's needs. These conflicts are disclosed through delivery of this Form ADV Brochure.

Everspire addresses these conflicts by clearly disclosing advisor's dual roles and the inherent conflicts therein; limiting B/D Rep recommendations to products that are not available through the advisory platform; limiting recommendations to "no-load" mutual funds; waiving fees on packaged products that carry a commission, regardless of where it was purchased; not accepting 12b-1 fees in advisory accounts; and not participating in revenue sharing. Clients may also purchase insurance and investment products recommended by their Everspire-affiliated B/D Representative through a channel of their choice (including brokers or agents not affiliated with Everspire).

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

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Everspire does not accept performance-based fees.

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#### ITEM 7 – TYPES OF CLIENTS

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

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

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### **Methods of Investment Analysis**

Everspire constructs portfolios primarily consisting of mutual funds, ETFs, and individual stocks. In doing so, the firm relies on experts including Chartered Financial Analysts (CFAs), research firms, and Nobel Prize winning economists for advice on asset allocation and security selection. The investment team relies on tools that include:

- Fundamental analysis of security, sector, and asset class characteristics
- Modern Portfolio Theory (MPT) best practices, including optimal allocation across asset classes and geographies, optimal index constitution, etc.
- Analysis of market and economic trends and conditions (GDP, interest rates, etc.)
- Investment vehicle characteristics, asset class coverage, performance, and cost



## **Investing Risks**

Investing in securities involves risk of loss that clients should be prepared to bear. Securities are not FDIC insured and have no bank guarantee. All of Everspire’s strategies involve some element of risk. Stocks may decline in value or may not appreciate enough to meet expectations. The rate of return on low-risk investments may not exceed inflation. The value of a bond portfolio may decline if interest rates rise, credit-worthiness declines, or if bonds default or cease payment of dividends. Investing strategies based on particular investing philosophies (“Growth,” “Value”) rely on historical data to make assumptions about future market behavior. These historical patterns and investment metrics may not have predictive value. Financial planning assumptions about a client’s expected costs or investment returns may be inaccurate. Liability-driven planning and investment strategies are not guaranteed to provide adequate future funding.

## **Micro- and Small-Cap Risk**

Micro- and Small-Cap companies have specific risks. Small companies may be in an early stage of development or have an untested business model; future business may depend on in-process research and development; they may come into competition with larger companies with greater resources; their business may depend on a single company or industry; their shares may be illiquid; or credit may not be as easily available.

## **Foreign and Emerging Market Risks**

Investing in foreign equity markets entails certain risks which increase as a nation’s level of development decreases. These may include limits on publicly available information; difficulty in comparing accounting standards; insufficient government supervision of markets; limited liquidity; higher brokerage costs and delays; higher tax and other withholdings; political instability, war, or expropriation of assets; social and financial instability; difficulty in obtaining legal judgments in non-US courts; foreign currency risk; and currency conversion costs.

## **Mutual Fund & ETF Risks**

Mutual fund and ETF shareholders are subject to product-specific risks. Risks may stem from the operations of the fund issuers. Clients invested in different funds with similar holdings may reduce the benefits of diversification for the investor (fund overlap). Mutual funds realize and distribute capital gains to investors and these gains may not be optimized. Mutual fund trading prices may differ significantly from the fund’s net asset value (NAV) during market volatility, which may lead to the fund’s shares trading at a premium or discount.

ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV but inefficiencies or



volatile markets may cause the shares to trade at a premium or discount to their NAV. There is no guarantee that a liquid secondary market for ETF shares will develop or continue to exist, leaving shareholders no way to dispose of such shares.

### **Cybersecurity Risk**

Investing involves operational and cybersecurity risks. Unintentional events or deliberate attacks on Everspire, its service providers, or investment issuers may result in a loss or corruption of data or the unauthorized release of confidential information. Everspire has established business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches but there are inherent limitations in these plans and systems: certain risks may not yet have been identified, unknown threats may emerge in the future, and Everspire does not control the cybersecurity systems of third-parties.

### **Margin Risk**

Borrowing against the securities that a client owns in order to withdraw funds from an account or purchase additional securities (“margin borrowing”) carries a high level of risk. Margin borrowing magnifies the gains or losses in the client’s account. Margin borrowers rely on their account custodians for their line of credit. These custodians may increase margin interest rates at any time, may change margin maintenance requirements for any or all securities, or they may eliminate margin borrowing altogether. Any of these factors may force the client to liquidate holdings at an inopportune time and result in significant realized losses. Forced liquidations may have negative tax consequences for the client.

### **Disruptive Event Risk**

Disruptive social and geopolitical events (pandemics, war, etc) may result in travel disruptions, quarantines, and reductions in consumer and productive activity. These impacts may cause economic disruption, market volatility, or disruptions to securities markets. Everspire has adapted its practices and established a business continuity plan to ensure that service to clients is not interrupted by disruptive events and the firm monitors and liaises with third-party vendors to ensure they are prepared to continue uninterrupted service in the face of disruption. Nevertheless, there is no guarantee that future pandemics or other disruptive events will not impact global markets or disrupt business functioning.

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#### ITEM 9 – DISCIPLINARY INFORMATION

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There are no legal or disciplinary disclosures material to a client’s consideration of Everspire.

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#### ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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M. H. LeBlang, Inc. (dba "MHL Investments" or "MHL") is a broker-dealer and a related person of Everspire. MHL Investments is a member of FINRA and the Securities Investor Protection Corporation (SIPC). The following Everspire representatives or employees ("Associates") are registered representatives of MHL: Joshua Jones, Roy Jones, Ryan Tucker, Adam Lazaro, Adam Cook, and Thomas Melburn. Additionally, Joshua Jones and Roy Jones (the owners of Aegis Wealth Group, LLC) are owners of MHL. Associates may receive standard sales commissions from sponsors of alternative investment products through MHL. All sales commissions are paid from the revenues of the product sponsors. MHL is also active as an insurance agency (see Item 5) and so licensed agents may receive compensation for the sale of insurance products. This compensation through MHL is separate and distinct from Everspire's advisory revenue and from the e6Portfolios wrap fee program.

These relationships with MHL create a conflict of interest because it may create an incentive to recommend investment products based on the compensation received. Measures to address these conflicts of interest are described in Item 5.

Everspire recommends TomiPlan to clients interested in receiving Financial Planning services. TomiPlan is an affiliated firm under shared ownership with Everspire and so Everspire has an incentive to recommend the firm. Everspire advisors also receive referral compensation for referring clients to TomiPlan. Everspire addresses these conflicts of interest by disclosing the relationship.

Nathan Rockwell, CPA is one of Everspire's Investment Advisor Representatives. He is also the owner of Carefree Professional Practice Resources, LLC, a CPA firm. Carefree is therefore affiliated with Everspire. Everspire addresses this conflict of interest by recommending multiple CPA firms to Clients, not requiring Clients to use any particular CPA, and not accepting compensation from any CPA firm in exchange for referrals.

Everspire recommends the e6Portfolios Wrap Fee Program to clients. Because both Everspire and e6Portfolios are /dbas of Aegis Wealth Group, LLC, Everspire has an incentive to recommend e6Portfolios because it shares in any revenue received from e6Portfolios. Everspire IARs do not receive any additional compensation for recommending e6Portfolios. Everspire addresses this conflict of interest by fully disclosing the relationship.

Everspire does not recommend or select other investment advisers for clients.

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

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



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

Everspire’s complete Code of Ethics is available upon request by contacting our office at [hello@everspire.com](mailto:hello@everspire.com).

Everspire advisors and related persons often invest in the same or similar securities to those that are held by clients. Most transactions of this type are mutual funds, which do not present trading conflicts of interest. ETF, stock, and bond transactions are less common but may present a conflict of interest because client trades in the security may affect the share price and create opportunities for “front running” and other abuses. To mitigate conflicts of interest, advisors and related persons are required to link securities accounts to the Everspire platform for supervision or report their transactions quarterly. Employee trades are reported to the firm and reviewed to ensure that Everspire clients are not disadvantaged by the trading activity.

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

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#### ITEM 12 – BROKERAGE PRACTICES

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Everspire recommends Fidelity Investments or Interactive Brokers to clients as qualified custodian and broker-dealer for client transactions. For clients who wish to open 529 educational accounts, Everspire recommends My529, an educational savings plan sponsored and operated by the State of Utah. Everspire makes these recommendations based on quality of execution, reliability, impartiality, service, capabilities, quality of technology, and reasonableness of cost in relation to comparable broker/dealers. Everspire monitors broker/dealer compensation and evaluates whether it is clients’ interest to explore new custody options; furthermore, Clients who participate in the e6Portfolios wrap program do not bear trading costs, typically one of the largest drivers of client cost at the broker/dealer. Everspire does not direct clients to broker-dealers due to soft dollar benefits. Clients may choose an alternative broker/dealer to custody their assets; however, the alternative custodian may not approve Everspire on their platform and Everspire will consider relationship size before agreeing to work with the custodian. Everspire recommends the e6Portfolios Wrap Fee program to clients and e6Portfolios does require that clients choose among certain custodians. Clients should review the Wrap Fee brochure and their advisory agreement.

Qualified custodians provide Everspire and its clients access to institutional brokerage services including a range of investment products, execution of securities transactions, and custody of



client assets. The investment products available through institutional platforms include some to which clients might not otherwise have access or that would require higher minimums by clients acting individually. These services directly benefit clients or their account(s) and they are made available on an unsolicited basis and at no charge to us or the client.

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

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

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

Everspire currently accepts discretion over a limited number of legacy accounts for clients not enrolled in the e6Portfolios wrap program. For these clients, Everspire aggregates client trades on a limited and best efforts basis. The bulk of client assets are invested in mutual funds which are not vulnerable to trading conflicts of interest. A smaller proportion of client trading is in done through ETFs or individual securities. These transactions are generally small in size and Everspire chooses securities with high daily trading volumes in order to minimize any potential inequities created by sequence of transaction. Other circumstances inherently preclude aggregation, such as client-directed liquidation or distribution of funds, new deposits arriving in only one account, etc. It is possible that these aggregation practices may result in less favorable execution for one client than another.

However, Everspire may use aggregated trading on a case-by-case basis where the same ETF or security is purchased or sold for more than one client at the same time. In cases where aggregated trading is used, a target trade size and allocation among client accounts will be established, the shares will be purchased or sold, an average price established, and the trade allocated among client accounts at the established average price. If it is not possible to buy or



sell the planned number of shares, the partial trade will be allocated among clients proportionally according to the planned allocation. In some cases, Everspire may make use of aggregated trading more than once during a single trading day for the same security but for different groups of clients, resulting in different average prices.

Everspire recommends the e6Portfolios Wrap Fee Program to clients for investments. Clients should consult the e6Portfolios Wrap Brochure regarding their trading practices.

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#### ITEM 13 – REVIEW OF ACCOUNTS

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Clients with active financial plans have their plans maintained on an ongoing basis and their advisor requests that the client meet with them annually to review the plan (see Item 4 above). Clients without a financial plan have their investment goals and risk tolerance reviewed annually. Everspire requests that all clients meet with their advisor at least annually. All clients are required to apprise the firm of material changes in their personal, tax, or financial situation. Additional reviews may occur in response to cash inflows and outflows and evolving market and macroeconomic conditions. Everspire also reviews Wrap Fee and other investment program recommendations for performance and consistency with the selected investment strategy.

Everspire publishes a written statement for each client each month. Notification is delivered to the client and the statements are made available securely online and on a mobile app. This report shows a summary of activity (performance reporting), allocation information, detailed analytics, and a fee calculation and invoice. For Financial Planning clients, these reports include an assessment of the client's probability of success at meeting financial goals. Additionally, clients can publish a variety of custom reports on demand.

Account custodians generate brokerage statements no less than quarterly. These statements are provided by the custodian to the client and list the account positions, activity, and the fees paid to Everspire. Trade confirmations are also sent unless they have been waived by the client.

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#### ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

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The firm does not directly or indirectly compensate any person who is not a supervised person, nor receive any economic benefit from anyone other than a client for providing services to the firm's clients. Everspire pays dues to professional trade groups or associations which may provide a listing of their members, including Everspire and its IARs, to consumers who inquire. These organizations are not compensated by the sale of securities or assets under management.

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#### ITEM 15 – CUSTODY

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Everspire will never take custody of client funds or securities. However, because Everspire withdraws advisory fees directly from client accounts, the firm is deemed by the SEC to have





custody in a limited capacity. A qualified custodian sends account statements quarterly, or more frequent, to Everspire clients and clients should carefully review those statements.

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

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#### ITEM 16 – INVESTMENT DISCRETION

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Clients may or may not grant Everspire discretion. In cases where Everspire accepts discretionary authority to manage securities accounts on behalf of clients, the firm obtains prior written authorization from clients to determine the securities and quantity of securities to be bought and sold, the time of execution, the price at which the trades will be executed, the broker/dealer to be used, and the commission rates to be paid. Everspire is not authorized to withdraw fees or transfer assets out of the account(s) without the written permission of the client.

Clients may establish reasonable restrictions on the investments in their portfolio (such as restricting the purchase of certain kinds of stocks) if agreed upon in advance with the Advisor. However, Everspire cannot guarantee that mutual funds and ETFs held by the client do not hold the restricted position. Unless otherwise agreed, in cases where a client grants discretion, the accounts a client transfers to Everspire will be liquidated and the proceeds reinvested in the strategy chosen by the client.

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#### ITEM 17 – VOTING CLIENT SECURITIES

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

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#### ITEM 18 – FINANCIAL INFORMATION

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

Everspire has never been the subject of a bankruptcy petition.





## Wrap Fee Program Brochure

(Form ADV Part 2A, Wrap)

March 9, 2023

This brochure provides information about E6Portfolio's qualifications and business practices. If you have questions about the brochure, please contact us at [hello@e6portfolios.com](mailto:hello@e6portfolios.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as an investment advisor does not imply a certain level of skill or training. Provision of this brochure does not relieve e6Portfolios of any other disclosure obligations the firm may have under federal or state law. Additional information about e6Portfolios is available by searching the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by firm name or CRD number (#222515).

**6900 S. 900 E. Suite 200, Midvale, UT 84047**

**[e6Portfolios.com](http://e6Portfolios.com) | 801-545-8706**

## ITEM 2 – MATERIAL CHANGES

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This document summarizes material changes to e6Portfolios Form ADV Part 2A (Wrap Brochure) since the previous update (November 2022). Clients receive a summary of changes within 120 days of year-end and whenever the firm’s practices change materially. A full copy of e6Portfolios’s most recent brochure may be requested at any time by contacting Roy Jones at 801-545-8706 or [hello@e6portfolios.com](mailto:hello@e6portfolios.com) or by searching the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by firm name or CRD number (#222515).

**e6Portfolios Affiliates:** Item 4 and Item 9 of our Wrap Brochure has been updated to disclose new e6Portfolio affiliates. First, e6Portfolios now refers clients wishing to receive Financial Planning to TomiPlan. TomiPlan offers Financial Planning on a subscription basis. The firm is affiliated with e6Portfolios through shared ownership, so the subscriptions that clients pay to TomiPlan benefit e6Portfolios.

Second, e6Portfolios is now affiliated with Carefree Professional Practice Resources, LLC, a CPA firm, because the owner, Nathan Rockwell, CPA, is one of e6Portfolios’ Investment Advisor Representatives.

ITEM 3 – TABLE OF CONTENTS

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<b>ITEM 2 – MATERIAL CHANGES</b>	<b>2</b>
<b>ITEM 3 – TABLE OF CONTENTS</b>	<b>3</b>
<b>ITEM 4 – SERVICES, FEES, AND COMPENSATION</b>	<b>4</b>
<b>ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS</b>	<b>8</b>
<b>ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION</b>	<b>8</b>
<b>ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS</b>	<b>11</b>
<b>ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS</b>	<b>11</b>
<b>ITEM 9 – ADDITIONAL INFORMATION</b>	<b>11</b>

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## ITEM 4 – SERVICES, FEES, AND COMPENSATION

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### **Wrap Fee Program**

Aegis Wealth Group, LLC was founded on October 25, 2005 by owners Roy Jones and Joshua Jones and registered as an independent RIA in 2015. The firm is organized as a Limited Liability Company in the state of Utah.

As of February 9, 2023, Aegis Wealth Group, LLC managed \$95,400,000 in discretionary assets and \$0 in non-discretionary assets through its Wrap Fee Program.

Aegis Wealth Group, LLC participates in and sponsors a Wrap Fee Program that is branded as e6Portfolios. Wrap fee programs offer clients investment management as well as transaction and clearing services for one inclusive fee. The e6Portfolios Wrap Fee Program requires clients to grant the firm trading discretion over the accounts under management.

### **e6Portfolios Core Service**

e6Portfolios builds, maintains, and implements security models in client accounts. These models can be used alone or in combination to deliver a balance of risk and opportunity that corresponds to the client's investment objectives and risk tolerance.

e6Portfolios investment models seek to optimize sources of expected return by tilting index-like portfolios toward companies with "value" characteristics, smaller companies, and companies with higher profitability. e6Portfolios are also global, incorporating more exposure to international and emerging markets than most comparable strategies. e6Portfolios looks to the fixed income allocation in a portfolio as a source of stability and therefore generally prioritizes lower volatility over yield in selecting fixed income investments. e6Portfolios offers twelve variations on its core portfolio, ranging from very conservative to very aggressive. e6Portfolios also offers cash management portfolios as well as models that account for illiquid, alternative, or real estate investments the client may hold elsewhere in the overall allocation.

Clients generally work with an advisor to determine an appropriate level of risk for their investments, but they are not required to. Everspire, an e6Portfolios-affiliated brand, offers advisory services to clients under a separate agreement and for a separate fee. A client may also work with a non-affiliated advisor or may work directly with e6Portfolios without having an advisor. e6Portfolios fees do not include advisory services of any kind.

When a client agrees to work with e6Portfolios, they are required to complete a risk profile and provide it to the firm. They must also select an e6Portfolios investment strategy. They may do so in their initial advisory agreement or by communicating it to e6Portfolios directly. The client may change their investment election at any time by communicating the change in writing.

In addition to providing and implementing investment models (our SMA service), e6Portfolios also provides Unified Managed Account (UMA) services to the client. This includes placing investments with different risk profiles in the most tax-appropriate account type, managing realized and unrealized gains, managing cash allocations within a single account or across multiple accounts, and rebalancing across multiple accounts and account types. Some legacy agreements may separate services described above into SMA and UMA services and charge separately for each service or, in some cases, offer only SMA services. Clients should review their advisory agreement.

e6Portfolios provides ongoing oversight to client portfolios. An investment committee reviews e6Portfolios model portfolios to assess performance and determine the best investments to use to meet the portfolios’ goals. e6Portfolios personnel directly manage client assets in the e6Portfolios core program. The investment team reviews client accounts on an ongoing basis to ensure the portfolio conforms to model targets, invest and raise cash in the account as needed, identify tax gain/loss opportunities, determine whether rebalancing is necessary, and then set up and execute any needed trades.

**Wrap Program Fees**

e6Portfolios offers its core services at the following rates:

**Investment Management and Unified Managed Account (UMA) Services**

<u>Asset Range</u>		<u>Fee</u>
\$ -	to \$ 999,999	0.50%
1,000,000	to 4,999,999	0.45%
5,000,000	to 9,999,999	0.35%
10,000,000	to 24,999,999	0.25%
25,000,000	to 49,999,999	0.15%
50,000,000	to 250,000,000	0.10%
250,000,000	to 999,999,999	0.05%
1,000,000,000	and above	0.01%

Clients receiving legacy services may pay different fees than those stated here. Clients should review their investment management agreements for more information and all clients may switch to the new fee schedule by requesting a new advisory agreement.

**Fee Calculation and Manner of Payment**

Asset tiers are calculated and applied based on all assets in the client’s household that are under management by e6Portfolios. A “Client household” is generally limited to a person or a

couple who share finances; e6Portfolios reserves the right determine who is included in a client household.

Fees are deducted from client accounts monthly in arrears and are calculated based on the average daily balance of the account during the month. Advisory fees are not collected in advance. The client's agreements with e6Portfolios and with their qualified custodian provide authorization to deduct management fees from the client's account directly and remit that fee to the firm. e6Portfolios will send a bill to the qualified custodian indicating the amount of the fee to be paid. The custodian will send a statement to the client, at least quarterly, indicating the fee dispersed. Each time the fee is assessed, e6Portfolios will make a statement available to the client showing the amount of the fee and how the fee was calculated. e6Portfolios will disclose to clients their responsibility to verify the accuracy of the fee calculation.

Because it is a Wrap Fee program, e6Portfolios bears the cost of all transactions that take place in the client account, including trading commissions, mutual fund ticket charges, clearance, and any other transaction costs. Because e6Portfolios bears transaction costs, the firm may have a financial incentive to trade less frequently in Wrap Fee Program accounts than would be beneficial to the client. Similarly, many custodians offer non-transaction fee funds or do not charge commissions on ETF or equity trades. e6Portfolios has an incentive to purchase these investments for the client rather than investments that have a trading cost.

The e6Portfolios Wrap Program may cost more or less than purchasing similar services separately from another firm. Relative cost depends on the cost of each service if provided separately, the comparative volume of trading, and the cost of trading, among other factors.

Clients bear the cost of management fees and other expenses imposed directly by mutual funds or exchange traded funds held by the client; spreads paid to market makers; and any fees agreed to directly with the account Custodian such as custodial, account, or wire fees.

e6Portfolio fees are not negotiable, although fees are reduced for employees and family. All fees received by the wrap program are paid to the portfolio manager, e6Portfolios.

### **Relationship with Everspire**

e6Portfolios and Everspire are both /dbas of Aegis Wealth Group, LLC. e6Portfolios recommends that clients receive Wealth Management / Dedicated Advisor services through Everspire but does not require it. Any fees paid to Everspire for Wealth Management benefit e6Portfolios and any fees paid to e6Portfolios for Investment Management services benefit Everspire. Advisors at Everspire do not receive additional compensation for recommending clients to e6Portfolios.

### **Relationship with TomiPlan**

e6Portfolios recommends that clients receive Financial Planning services through TomiPlan. TomiPlan is an affiliated company under shared ownership with e6Portfolios and e6Portfolios therefore benefits from any Financial Planning fees paid to TomiPlan.

## Investment Discretion

e6Portfolios clients grant the firm discretionary trading authority in the account(s) so that the firm can implement the agreed-upon investment model. Discretion includes the authority to make all decisions to investigate, buy, sell, or hold securities, cash, or other publicly traded investments on behalf of the client at e6Portfolios' sole discretion and without first consulting the client. In their agreements with the qualified custodian, the client authorizes the custodian to follow e6Portfolios' instructions concerning trading and other investment activity in the account on behalf of the client.

## Termination

e6Portfolios or the client may end the advisory relationship at any time without penalty or fee by giving written notice to the other party. Clients should review their Advisory Agreement for further details. Clients enter into relationships with the account custodian directly and should review their custodial agreement for conditions related to terminating the agreement.

## Brokerage Practices

e6Portfolios requires that clients use Fidelity Investments or Interactive Brokers as their qualified custodian. These recommendations are based on quality of execution, cost, reliability, impartiality, service, capabilities, and quality of technology. e6Portfolios does not direct clients to broker-dealers due to soft dollar benefits and clients are free to choose between these two custodians, although accounts at Interactive Brokers must have a value of at least \$1,000,000.

Qualified custodians provide access to institutional brokerage services including a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through institutional platforms might not otherwise be available to clients or would require a higher minimum investment by clients acting individually. These services directly benefit clients and they are made available on an unsolicited basis and at no charge to e6Portfolios or the client.

Qualified custodians also make other products and services available to e6Portfolios that may not directly benefit the client or their account(s). For example, the custodian may provide research resources used to improve service to all or some client accounts, including accounts not maintained at the custodian providing the research. Qualified custodians also provide software and other technology; support for third-party service providers; trade aggregation; market data; and assistance with back-office functions, recordkeeping, and client reporting.

Custodians may provide or arrange services that help e6Portfolios develop its business such as educational conferences and events; technology, compliance, legal, and business consulting; publications and conferences on practice management; and access to employee benefits providers, human capital consultants, and insurance providers. These services are not contingent on e6Portfolios committing any specific amount of business to the custodian in



trading commissions or assets in custody, nor are they based on e6Portfolios giving any particular investment advice, such as buying particular securities for clients. Access to some of these resources may play a part in e6Portfolios' choice of custodians. e6Portfolios addresses this conflict of interest by carefully vetting its custodians and providing clients a choice.

e6Portfolios does not receive client referrals from its qualified custodians.

e6Portfolios aggregates client trades on a limited and best efforts basis. Client assets are generally invested in mutual funds which are not vulnerable to trading conflicts of interest. Some client trading is done through ETFs or individual securities. These transactions are generally small in size and e6Portfolios chooses securities with high daily trading volumes in order to minimize any potential inequities created by sequence of transaction. Other circumstances inherently preclude aggregation, such as client-directed liquidation or withdrawal of funds, new deposits arriving in only one account, etc. It is possible that these aggregation practices may result in less favorable execution for one client than another.

e6Portfolios may use aggregated trading on a case-by-case basis where the same ETF or security is purchased or sold for more than one client at the same time. In cases where aggregated trading is used, a target trade size and allocation among client accounts is established, the shares are purchased or sold, an average price established, and the trade allocated among client accounts at the established average price. If it is not possible to buy or sell the planned number of shares, the partial trade will be allocated among clients proportionally according to the planned allocation. In some cases, e6Portfolios may make use of aggregated trading more than once during a single trading day for the same security but for different groups of clients, resulting in different average prices.

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#### ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

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The e6Portfolios Wrap Fee Program is currently offered to clients who use Interactive Brokers or Fidelity Investments as their qualified custodian and broker/dealer.

The e6Portfolios Wrap Program serves individuals, high net worth individuals, businesses, families, charitable organizations, and retirement plans. The Wrap Program does not have a formal minimum, but e6Portfolios will consider overall relationship size before agreeing to work with a client.

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#### ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

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Aegis Wealth Group, LLC (/dba Everspire) is the Sponsor for the Wrap Fee Program. e6Portfolios (which is also a /dba of Aegis Wealth Group, LLC) is the sole Portfolio Manager for the Wrap Fee Program and will not select any outside manager for the program. By managing client portfolios in-house, e6Portfolios introduces a conflict of interest because the firm benefits financially from the portfolio management revenue. e6Portfolios counteracts this

conflict of interest by fully disclosing the conflict and not requiring clients to make use of e6Portfolios' investment management services.

Related-person portfolio managers are evaluated by assessing the performance of e6Portfolio strategies against relevant benchmarks. e6Portfolios selects common industry benchmarks to assess the performance of the investment strategies it offers and calculates the performance of client accounts using industry standard methodologies. Presentations containing performance information are reviewed by e6Portfolios for accuracy.

e6Portfolios offers portfolio management services to its Wrap Fee Program participants as described in Item 4 above. e6Portfolios' recommendations are limited to mutual funds, ETFs, and individual stocks in model portfolios.

e6Portfolios offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Clients may impose reasonable restrictions on the management of their account if communicated in writing. e6Portfolios allocates assets to mutual funds and ETFs and cannot guarantee that a restricted security is not held in a mutual fund or ETF that is owned by a Client.

Because both the participant in and the sponsor of the Wrap Program are affiliated with Aegis Wealth Group, LLC all fees from the e6Portfolios Wrap Fee program are effectively paid to Aegis Wealth Group, LLC.

e6Portfolios does not accept performance-based fees.

### **Methods of Analysis and Investment Risks**

e6Portfolios relies on a variety of analytical methods. These include:

- Reliance on Chartered Financial Analysts (CFAs), research firms, and Nobel-Prize-winning economists for asset allocation and security selection advice;
- Fundamental analysis of security, sector, and asset class characteristics;
- Modern Portfolio Theory (MPT) best practices, including optimal asset class and geographical allocation, optimal index constitution, etc.;
- Market and macroeconomic conditions such as GDP, interest rates, etc.;
- Investment characteristics, asset class coverage, performance, and cost

### **Investing Risks**

Investing in securities involves risk of loss that clients should be prepared to bear. Securities are not FDIC insured and have no bank guarantee. All of e6Portfolio's strategies involve some element of risk. Stocks may decline in value or may not appreciate enough to meet expectations. The rate of return on low-risk investments may not exceed inflation. The value of a bond portfolio may decline if interest rates rise, credit-worthiness declines, or if bonds

default or cease payment of dividends. Investing strategies based on particular investing philosophies (“Growth,” “Value”) rely on historical data to make assumptions about future market behavior. These historical patterns and investment metrics may not have predictive value. Financial planning assumptions about a client’s expected costs or investment returns may be inaccurate. Liability-driven planning and investment strategies are not guaranteed to provide adequate future funding.

### **Micro- and Small-Cap Risk**

Micro- and Small-Cap companies have specific risks. Small companies may be in an early stage of development or have an untested business model; future business may depend on in-process research and development; they may come into competition with larger companies with greater resources; their business may depend on a single company or industry; their shares may be illiquid; or credit may not be as easily available.

### **Foreign and Emerging Market Risks**

Investing in foreign equity markets entails certain risks which increase as a nation’s level of development decreases. These may include limits on publicly available information; difficulty in comparing accounting standards; insufficient government supervision of markets; limited liquidity; higher brokerage costs and delays; higher tax and other withholdings; political instability or war; expropriation of assets; social and financial instability; difficulty in obtaining legal judgments in non-US courts; foreign currency risk; and currency conversion costs.

### **Mutual Fund & ETF Risks**

Mutual fund and ETF shareholders are subject to product-specific risks. Risks may stem from the operations of the fund issuers. Clients invested in different funds with similar underlying holdings may reduce the benefits of diversification for the investor (fund overlap). Mutual funds realize and distribute capital gains to investors and these gains may not be optimized. Mutual fund trading prices may differ significantly from the fund’s net asset value (NAV) during market volatility, which may lead to the fund’s shares trading at a premium or discount.

ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV but inefficiencies or volatile markets may cause the shares to trade at a premium or discount to their NAV. There is no guarantee that a liquid secondary market for ETF shares will develop or continue to exist, leaving shareholders no way to dispose of such shares.

### **Cybersecurity Risk**

Investing involves operational and cybersecurity risks. Unintentional events or deliberate attacks on e6Portfolios, its service providers, or investment issuers may result in a loss or corruption of data or the unauthorized release of confidential information. e6Portfolios has established business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches but there are inherent limitations in these plans and systems: certain risks may not yet have been identified, unknown threats may emerge in the future, and e6Portfolios does not control the cybersecurity systems of third-parties.

### **Disruptive Event Risk**

Disruptive social and geopolitical events (pandemics, war, etc) may result in travel disruptions, quarantines, and reductions in consumer and productive activity. These impacts may cause economic disruption, market volatility, or disruptions to securities markets. e6Portfolios has adapted its practices and established a business continuity plan to ensure that service to clients is not interrupted by disruptive events and the firm monitors and liaises with third-party vendors to ensure they are prepared to continue uninterrupted service in the face of disruption. Nevertheless, there is no guarantee that future pandemics or other disruptive events will not impact global markets or disrupt business functioning.

e6Portfolios will not ask for nor accept voting authority for client securities (proxy voting).

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#### ITEM 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

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e6Portfolios is the portfolio manager for this wrap fee program and therefore will have immediate access to any client information collected.

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#### ITEM 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS

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Clients who engage an investment advisor through Everspire work through their advisor when they have questions about their account or portfolio model. For clients working with e6Portfolios directly, the firm places no restrictions on their ability to contact portfolio managers during regular business hours using the contact information in this brochure.

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#### ITEM 9 – ADDITIONAL INFORMATION

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### **Disciplinary Action and Other Financial Industry Activities**

There are no legal or disciplinary disclosures material to a client’s consideration of e6Portfolios.

### **Registration as a Broker/Dealer or Broker/Dealer Representative**

M. H. LeBlang, Inc. (/dba “MHL Investments”) is a broker-dealer and a related person of Aegis Wealth Group, LLC, of which e6Portfolios is a /dba. Joshua Jones and Roy Jones are owners of

MHL Investments. Several e6Portfolios Investment Advisor Representatives, namely Joshua Jones, Roy Jones, Ryan Tucker, Adam Lazaro, Adam Cook, and Thomas Melburn, are registered representatives of MHL. They may receive sales commissions from sponsors of alternative investment products through MHL. MHL is also active as an insurance agency (see Item 5) and so licensed agents may receive compensation for the sale of insurance products. Revenue received through MHL is separate and distinct from E6Portfolio's fees. These relationships with MHL Investments may create an incentive to recommend products based on the compensation received.

### **Affiliation with TomiPlan**

Everspire recommends TomiPlan to clients interested in receiving Financial Planning services. TomiPlan is an affiliated firm under shared ownership with Everspire and so Everspire has an incentive to recommend the firm. Everspire advisors also receive referral compensation for referring clients to TomiPlan. Everspire addresses this conflict of interest by fully disclosing the relationship and not requiring clients to have a financial plan or work with TomiPlan.

### **Affiliation with Carefree Professional Practice Resources, LLC**

Nathan Rockwell, CPA is one of Everspire's Investment Advisor Representatives and also the owner of Carefree Professional Practice Resources, LLC, a CPA firm. Carefree is therefore affiliated with Everspire. Everspire addresses this conflict of interest by recommending multiple CPA firms to Clients, not requiring Clients to use any particular CPA, and not accepting compensation from any CPA firm in exchange for referrals.

### **Selection and Compensation of Other Advisors and Managers; Client Referrals**

e6Portfolios does not recommend or select other investment advisors for clients. Other investment advisors may recommend e6Portfolios to their clients or engage e6Portfolios directly to provide investment management services but e6Portfolios does not compensate these other advisors for these referrals.

### **Code of Ethics**

e6Portfolios has adopted a Code of Ethics in accordance with SEC rules under the Investment Advisers Act of 1940. The Code of Ethics contains provisions that, among other things:

- Set forth standards of conduct expected of advisory personnel;
- Safeguard material non-public information about clients and client transactions;
- Require access persons to report their personal securities transactions;
- Defines conflicts of interest and describes prohibited activities;
- Requires compliance with the broad antifraud provisions of the Advisers Act; and

- Adheres to the principles outlined in “Real Fiduciary Practices: Professional Conduct Guidance for Advisors,” published by the Institute for the Fiduciary Standard.

e6Portfolios’ complete Code of Ethics is available upon request by contacting our office at [hello@e6Portfolios.com](mailto:hello@e6Portfolios.com).

### **Investing Personal Money in the Same Securities as Clients**

e6Portfolios and its associated persons do not recommend to or buy or sell for clients any securities in which the firm or its associated persons have a material financial interest.

e6Portfolios associated persons often invest in securities that are the same or related to those held by clients. Most transactions of this type are mutual funds, which do not present conflicts of interest related to trading. ETF, stock, and bond transactions are less common but may present a conflict of interest because client trades in the security may affect the share price and create opportunities for “front running.” To mitigate conflicts of interest, advisors and related persons are required to link all securities accounts to the e6Portfolios platform for supervision or report their transactions quarterly. Employee trades are reviewed regularly to ensure that personal trading of advisors and related persons does not affect the markets and that e6Portfolios clients receive the same treatment as e6Portfolios employee transactions (See Item 4 – Brokerage Practices above for more detail).

### **Review of Accounts**

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

e6Portfolios publishes a written statement for each client which is available online or from the mobile app. This report shows a summary of activity (including fees and performance), allocation information, detailed analytics, and a fee calculation and invoice. Additionally, clients can print a wide variety of custom reports on demand.

Account custodians generate brokerage statements no less than quarterly. These statements are provided by the custodian to the client and list the account positions, activity, and the fees paid to e6Portfolios. Trade confirmations are also sent unless the client has waived them.

### **Compensation to Non-Advisory Personnel for Client Referrals**

The firm does not directly or indirectly compensate or receive compensation from any person who is not a supervised person. e6Portfolios does belong to (and pay dues to) professional trade groups which may provide a listing that includes e6Portfolios.

## Financial Information

e6Portfolios does not accept prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore does not include a balance sheet with this brochure.

e6Portfolios has never been the subject of a bankruptcy petition.