

East Bay Financial Services, LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of East Bay Financial Services, LLC. If you have any questions about the contents of this brochure, please contact us at (843) 628-3739 or by email at: mario@eastbayfs.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about East Bay Financial Services, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. East Bay Financial Services, LLC's CRD number is: 166207

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

Version Date: 04/16/2018

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of East Bay Financial Services, LLC on February 22, 2017 are described below. Material changes relate to East Bay Financial Services, LLC's policies, practices or conflicts of interests.

- East Bay Financial Services, LLC has updated Item 5.B. & Item 5.E.
- East Bay Financial Services, LLC has updated their Primary Office Address (Front Page)

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Item 4: Advisory Business

A. Description of the Advisory Firm

East Bay Financial Services, LLC is a Limited Liability Company organized in the state of South Carolina. The firm was formed in January of 2013 and the principal owner is Mario Anthony Nardone.

B. Types of Advisory Services

East Bay Financial Services, LLC (hereinafter "EB") offers the following services to advisory clients:

Investment Supervisory Services

EB offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. EB creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

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

In addition to traditional investment management, EB offers Socially Responsible Investing. This investment approach allows EB to provide the analytic and technical research for client-directed social and ethical screening of investments. Typically, these portfolios exclude most "vice" companies (e.g., oil, alcohol, defense sector, tobacco) for individual stocks, ETFs and mutual funds. EB also provides inclusive screens allowing clients to invest in companies with headquarters or substantial operations that positively impact the regional or local economy

For both traditional investment management and Socially Responsible Investing, EB evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. EB 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.

Investment Adviser Consulting

EB provides investment adviser consulting services. Representative of EB may assist firm leadership with investment decisions and compliance implementation, as well as providing client-facing presentations such as webinars, and investment reviews and analysis as needed.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services may be based on fixed fees or hourly fees and the final fee structure is documented in Exhibit I of the Financial Planning Agreement.

Services Limited to Specific Types of Investments

EB generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, REITs, insurance products including annuities, private placements, and government securities. EB may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

EB offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Financial and Investment Planning: At the end of EB's financial analysis process, EB provides recommendations on how to align investor goals and risk tolerances, typically in writing.

For clients who utilize social screening in their portfolios EB uses comprehensive and proprietary research to evaluate investments on client criteria and incorporate data into EB's regular reporting. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs for both traditional investment management and Socially Responsible Investing. However, if the restrictions prevent EB from properly servicing the client account, or if the restrictions would require EB to deviate from its standard suite of services, EB reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. EB does not participate in any wrap fee programs.

E. Amounts Under Management

EB has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$11,048,000.00	\$21,000.00	December 2017

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
Traditional Investment Management (First \$1,000,000)	1.00%
Traditional Investment Management (Next \$1,000,000 and beyond)	0.50%

EB maintains a minimum annual fee of \$2500. The firm may also charge a supplemental annual fee of 0.50% for customized portfolio management such as socially-responsible mandate. All fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit I of the Investment Advisory Contract. Fees are paid monthly or quarterly in advance or in arrears, and clients may terminate their contracts with 10 days' written notice. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. The frequency and method in which fees will be collected is predetermined between the client and EB as outlined in the Investment Advisory Contract. All advisory fees are withdrawn directly from the client's accounts with client written authorization. EB uses the last day of previous month or quarter, as applicable to the specific client, for purposes of determining the market value of the assets upon which the advisory fee is based.

For fees collected in advance, refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the month/quarter up to and including the day of termination. (*The daily rate is calculated by dividing the monthly/quarterly AUM fee by the number of days in the termination month/quarter).

Investment Adviser Consulting Fees

The rate for providing investment adviser consulting is a flat monthly fee plus an hourly fee arrangement for ad hoc projects. The fees charged will not exceed any limit imposed by any regulatory agency. This relationship will be memorialized in each contract between EB and the third-party adviser.

Financial Planning Fees

Fixed Fees

The rate for creating client financial plans is typically between \$2,000 and \$3,000, though may be negotiated based upon the complexity of the situation and the needs of the client. Fees are paid in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be attached as Exhibit I of the Financial Planning Agreement. Clients may terminate their contracts without penalty within 5 business days of signing the advisory contract.

Hourly Fees

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is between \$150 and \$300. The fees are negotiable and the final fee schedule will be attached as Exhibit I of the Financial Planning Agreement. Fees are paid in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. The fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination. Clients may terminate their contracts without penalty within 5 business days of signing the advisory contract.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are either withdrawn directly from the client's accounts with client written authorization or invoiced and billed directly to the client. Fees are paid monthly or quarterly in advance or in arrears as agreed upon and set forth in the Investment Advisory Contract. Clients may select the method in which they are billed.

For fees collected in advance, refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the month/quarter up to and including the day of termination. (*The daily rate is calculated by dividing the monthly/quarterly AUM fee by the number of days in the termination month/quarter).

Payment of Investment Adviser Consulting Fees

Fees are paid monthly in advance or arrears via check, ACH, or credit card.

Payment of Financial Planning Fees

Fixed Financial Planning fees are either withdrawn directly from the client's accounts with client written authorization or invoiced and billed directly to the client, but never more than six months in advance, with the remainder due upon presentation of the plan. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

Hourly Financial Planning fees are either withdrawn directly from the client's accounts with client written authorization or invoiced and billed directly to the client but never more than six months in advance, with the remainder due upon presentation of the plan. The fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

C. Clients Are Responsible 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 EB. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

EB collects fees in advance and in arrears. Fees that are collected in advance will be refunded as follows:

- Investment Advisory fees that are collected in advance will be refunded on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the month/quarter up to and including the day of termination. (*The daily rate is calculated by dividing the monthly/quarterly AUM fee by the number of days in the termination month/quarter).
- Fixed Financial Planning fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.
- Hourly Financial Planning fee refunds will be equal to the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

Fees will be returned within fourteen days to the client via mailed check.

E. Outside Compensation For the Sale of Securities to Clients

Neither EB nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

1. This is a Conflict of Interest

Accepting compensation for the sale of securities or other investment products, including asset based sales charges or services fees from the sale of mutual funds to its clients presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, they will document the potential conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

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

3. Commissions are not the Primary Source of Income for this RIA

Commissions are not EB's primary source of compensation.

4. 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

EB 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

EB generally provides or has the capacity and expertise to provide investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Non-profit institutions
- ❖ Company retirement plans and other corporate account types
- ❖ Investment Advisors

Minimum Account Size

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

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

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

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

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

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

Investment Strategies

EB uses portfolio management strategies, and may utilize long- or short-term trading strategies and/or options strategies (including covered options and/or spreading strategies). At the client's election, EB also offers Socially Responsible Investing, which involves common themes such as avoiding investment in companies that produce or sell addictive substances and seeking out companies engaged in environmental sustainability and alternative energy/clean technology efforts, among others.

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 solely 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.

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.

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 work long term.

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, it changes the very cycles they are trying to take advantage of.

Investment Strategies

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

“Trading” and options strategies may carry greater risk and clients should be aware that there is a material risk of loss using many of those strategies.

Socially Responsible Investing allows EB to provide the analytic and technical research for client-directed social and ethical screening of investments. This investment approach involves common themes such as avoiding investment in companies that produce or sell addictive substances and seeking out companies engaged in environmental sustainability and alternative energy/clean technology efforts. Typically, these portfolios exclude most “vice” companies (e.g., oil, alcohol, defense sector, tobacco) for individual stocks, ETFs and mutual funds. EB also provides inclusive screens allowing clients to invest in companies with headquarters or substantial operations that positively impact the regional or local economy via mutual funds and ETFs. Risks specific to Socially Responsible Investing include the likelihood that investment in attractive investment options in non-socially responsible areas will be precluded and the possibility that EB’s evaluation of what constitutes a socially responsible investment will be inaccurate or incomplete due to factors beyond its control. Investors are urged to carefully read fund prospectuses to determine exact philosophies. Socially responsible investing does not guarantee good return.

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

C. Risks of Specific Securities Utilized

EB generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international public markets. However, it may utilize options strategies. Options strategies generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies. 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. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value.

Fixed Income is an investment category that promises fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates and thus the price of the asset, and counterparties being unable to meet obligations.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

Real Estate funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor.

Hedge Funds are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, manager risk, and others.

REITs have specific risks including many they share with equity, plus others unique to commercial real estate and their unique structure.

Private placements carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

Precious Metal ETFs Investing in precious metals or ETFs investing in them carries the risk of capital loss.

Long term investing 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 other 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.

Options writing involves a contract to purchase or sell a security at a given price, not necessarily at market value, depending on the market This strategy includes the risk (or benefit) that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Short term trading risks include liquidity, economic stability and inflation (this is a terrible definition)

Short sales risks include the possible loss due to an upward movement in the value of the market or security shorted.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. Margin may be utilized to cover the purchase of securities while awaiting settlement of securities sold or cash deposited into the account. This does not constitute using margin for leverage.

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

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

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither EB nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

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

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

Neither EB nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

EB does not utilize nor select other advisers or third party managers. All assets are managed by EB management.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of EB may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of EB 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. EB will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own 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 EB may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of EB 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. EB will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

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

The Custodian will be chosen based primarily on its cost (specifically direct costs to the end client such as transaction fees), trade execution capabilities and performance, and access to desired investments such as stocks, bonds, mutual funds, and ETFs. EB will also consider other value-added services offered by the custodian that directly or indirectly benefit the end clients, such as software and services in the areas of portfolio management and compliance, among others. EB will not charge a premium or commission on transactions beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

EB receives standard research and services provided by its Custodian(s) as a value-added benefit of the business relationship. These include research, practice management, and portfolio tools, among others, that provide direct or indirect benefit to EB's end clients. EB will not accept benefits other than those in keeping with standards of industry practice along with execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits") that may incur a conflict of interest or perception thereof

2. Brokerage for Client Referrals

EB 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

EB allows clients to direct brokerage: however, EB may recommend custodians. EB may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may bear additional cost to clients because of the varying fee schedules and trading services of different custodians. Without the ability to direct brokerage, for instance, EB may not be able to aggregate orders to

reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

EB maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing EB the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

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

Client accounts are reviewed at least quarterly by Mario Anthony Nardone, Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and as per the client-specific planning agreement.

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

At least quarterly, each client will receive from the custodian, a written report that details the client's account including assets held and asset value. The custodian is also responsible for reports used for tax preparation.

EB may provide certain details and analysis upon client request, and/or reporting to complement that of the custodian.

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)

EB does not receive any economic benefit, directly or indirectly from any third party for advice rendered to EB clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

EB does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

EB, with client written authority, has limited custody of client's assets through direct fee deduction of EB's fees only. If the client chooses to be billed directly by the Custodian, EB would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

For those client accounts where EB will have investment discretion, the client has given EB written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides EB discretionary authority via a discretionary investment management clause in the Investment Advisory Contract and/or a limited power of attorney clause in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

EB 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

A. Balance Sheet

EB does not require nor solicit prepayment of more than \$500 in fees per client six months or more in advance and therefore does not need to include a balance sheet with this brochure

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

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

C. Bankruptcy Petitions in Previous Ten Years

EB 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

EB currently has only one management person/executive officer: Mario Anthony Nardone. Education and business background can be found on the Form ADV Part 2B brochure supplement for such individual.

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 individual' Form ADV Part 2B brochure supplement.

C. How Performance-based Fees are Calculated and Degree of Risk to Clients

EB 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

No management person at EB or EB has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

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