



Eagle Wealth Advisors

44 Pumpkin Hill Road
Westport, CT 06880 USA
+1 (860) 462-0796
www.eaglewealthadvisor.com

Form ADV Part 2A

January 7th, 2026

This brochure provides information about the qualifications and business practices of Eagle Wealth Advisors LLC (“EWA” or “we”). If you have any questions about the contents of this Brochure, please contact us at info@eaglewealthadvisor.com or +1 (860) 462-0796. 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 EWA also is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Item 2 – Material Changes

This Item discusses only specific material changes that are made to this Brochure and provides clients with a summary of such changes. EWA last filed an update to our Brochure on February 9th, 2024.

There are no material changes.

In the past, EWA has offered or delivered a brochure, with information about its qualifications and business practices, to clients on at least an annual basis. Pursuant to SEC rules, if there are material changes to the Brochure, EWA will provide a summary of any material changes to its Brochure within 120 days of the close of its fiscal year. EWA will also provide information about material changes to clients at other times during the year, if necessary.

EWA will provide you with a new Brochure, at any time, without charge.

Currently, our Brochure can be requested by contacting EWA via telephone at +1 (860) 462-8215. Our Brochure is also available on our website (<https://eaglewealthadvisor.com/disclosures/>) free of charge.



Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	6
Item 6 – Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients	8
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 – Disciplinary Information	14
Item 10 – Other Financial Industry Activities and Affiliations	14
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	14
Item 12 – Brokerage Practices	16
Item 13 – Review of Accounts	18
Item 14 – Client Referrals and Other Compensation	19
Item 15 – Custody	19
Item 16 – Investment Discretion	19
Item 17 – Voting Client Securities	20
Item 18 – Financial Information	20
Item 19 – Requirements for State-Registered Advisers	20

Item 4 – Advisory Business

EWA is a registered investment advisory firm founded in 2019 that provides investment advisory services and financial planning services to Clients (each a “Client”). EWA also serves institutional clients such as pension or profit-sharing plans, trusts, estates, and corporations and may provide business consulting services for those firms. As of EWA’s financial year end November 30th, 2025, EWA had \$164 million in assets under management, in which \$141 million in assets are managed on a discretionary basis and \$22 million in assets are managed on a non-discretionary basis.

EWA is principally owned by Joseph A. Romano.

Types of Advisory Services

Investment Management Services

EWA tailors its advisory services to the individual needs of its Clients. EWA gathers pertinent financial and demographic information about each Client utilizing a comprehensive Investor Profile Questionnaire (discussed in more detail below) to develop an investment strategy that will meet each Client’s unique needs, goals and objectives. Each Client account is managed according to these needs, goals and objectives. EWA periodically reviews the changes in each Client’s needs, goals and objectives and how they impact their accounts. EWA advises Clients on a broad range of investment vehicles including stocks, bonds, mutual funds, exchange traded funds (“ETFs”), unit investment trusts, real estate investment trusts, derivatives, digital assets, annuities, whole and term life insurance, and other commissioned products, and determines the appropriateness of each investment vehicle for each Client, based on the Client’s needs, goals and objectives. EWA’s investment advice is not limited to any type of investment vehicle. Clients can impose reasonable restrictions on investing in certain securities, types of securities, asset classes, or industry groups.

EWA’s comprehensive Investor Profile Questionnaire gathers information including, but not limited to:

- financial history (i.e. annual income, net worth, liabilities, estimated significant future expenditures, life events, and behavioral finance);
- investment history (i.e. years of investment experience, risk tolerance, time horizon, desired investment account styles, investment attitude, investment values, asset allocation, and securities restrictions, constraints, ESG or sustainable preferences); and,
- demographics (i.e. age, education, health, geography, number of dependents, and the age of each dependent).

EWA uses a number of proprietary analytical tools and commercially available optimization software applications in developing its asset allocation strategies for each Client. Among the factors considered in designing these strategies are historical rates of risk and return for various asset classes, correlation across asset classes and risk premiums. Each Client directly owns the securities (e.g. stocks, bonds, mutual funds or ETFs) purchased within their accounts and in respect of the investment strategies utilized within their accounts. Mutual funds, ETFs, closed-end funds, unit investment trusts and

real estate investment trusts and ETFs are collectively referred to throughout this document generally as a “Fund” or “Funds.” EWA does not act as a custodian of the Clients assets. EWA places trades for Clients under a limited power of attorney. Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the Client on an as-needed basis. Conflicts of interest will be disclosed to the Client in the event that they should occur. The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment advisory and management services may be beneficial to the Client.

Use of Third-Party Managers, Outside Managers, Sub-Advisors, and TAMPs (“Outside Managers”)

On rare occasions and upon a Clients explicit request, EWA can offer the use of Third-Party Managers, Outside Managers, Sub-Advisors, and TAMPs (collectively referred to as “Outside Managers”) for portfolio management services on either a portion or all of a Client’s assets under management. EWA assists Clients in completing the Outside Manager’s Investor Profile Questionnaire, selecting an appropriate allocation model, interacting with the Outside Manager, and reviewing the Outside Manager. EWA periodically reviews the changes in each Client’s needs, goals and objectives and how they impact accounts that utilize Outside Managers. EWA’s review process and analysis of Outside Managers is discussed in more detail in Item 8 below. Clients should consult the Outside Manager’s Form ADV Part 2A for a fuller description of that Outside Manager’s portfolio management services.

EWA currently offers the use of the following Outside Managers for portfolio management services:

- Investnet Asset Management, Inc. (“Investnet”)

Institutional Clients

EWA provides customized services to certain institutional clients, such as charities/foundations organized under Section 501(c)(3) of the US Internal Revenue Code and employment retirement plans. These services generally consist of investment due diligence and plan advice and management services under ERISA.

Financial Planning

Financial Planning is the process of evaluating a Client’s current financial circumstances, their short- and long-term monetary goals, and their strategies to achieve those goals. A financial plan can include, but is not limited to:

- the creation of financial statements (e.g. balance sheet, cash-flow statement, and income statement);
- a review of the Client’s financial accounts (e.g. individual and joint brokerage accounts, retirement accounts, education accounts, health accounts, checking and savings accounts, and UTMA’s and UGMA’s) and recommendations for changes;
- a review of the Client’s insurance policies and recommendations for changes;
- tax planning; and,
- estate planning.

Implementation of the recommendations included within the financial plan is at the discretion of the Client.

EWA is not a tax accountant or lawyer. For detailed tax and law advice, please seek a professional consultation.

Item 5 – Fees and Compensation

EWA is compensated by fees that are based on a percentage of the average market value of the investment assets under management within each Client account, (determined quarterly on an account by account basis and not in the aggregate). Fees are charged to the Client's accounts with the custodian on a quarterly basis in advance. Fees are negotiable and on average the range is approximately 1.00% to 1.50%

The initial fees will equal (on an annualized basis) the percentage as set forth in the EWA Client Investment Advisory Agreement ("Agreement") of the fair market value of the Client's assets and funds held within the account. Fees will be charged to the Client's account with the custodian on a quarterly basis in advance. The initial fees for the first calendar quarter (or part thereof) shall be calculated on the day after the Client's initial assets and funds are placed into the account with the custodian and charged the first day of the new month after the assets and funds are placed in the account and shall be the fees for the first calendar quarter (or part thereof). The initial fees for any partial calendar quarter shall be appropriately pro-rated based on the number of calendar days in the partial quarter. Thereafter, the fees shall be calculated at the beginning of each calendar quarter based on the value of the assets and funds held within the Client's account based on the last calendar day of the prior calendar quarter. Please note that the fees are assessed as a percentage of the assets and funds, and as such the total dollar amount of the fees may vary each quarter as the value of the assets and funds fluctuates.

Separately Managed Accounts

On rare occasions and upon a Client's explicit request, EWA can offer the use of an Outside Manager for portfolio management services pertaining to a Client account. These Client accounts are charged a single fee that includes EWA's fee and fees associated with the Outside Manager. Clients can then expect to only pay one fee ("Wrap Fee") for the account.

These accounts may also impose requirements to open or maintain a Client account, such as a minimum account size. Clients should separately refer to each Outside Manager's Form ADV Part 2A for more information regarding that Outside Manager's requirements regarding opening or maintaining a Client account.

For Clients who rely on Envestnet for portfolio management services, on average the Wrap Fee will range from approximately 1.08% to 2.82%. Clients should separately refer to Envestnet's Form ADV Part 2A, Envestnet's Investment Selection for the Client's particular account(s), and Envestnet's Private Wealth Management Program Terms and Conditions for a description of Envestnet's fees for the Client's particular account(s).

Other Fees

Fees may be charged pertaining to certain securities transactions in a Client's accounts, including: (i) dealer markups, markdowns or spreads charged on transactions in over-the-counter securities; (ii) costs relating to trading in certain foreign securities; (iii) the internal charges and fees that may be imposed by any collective investment vehicles ("Collective Investment Vehicles"), such as mutual funds and closed-end funds, unit investment trusts, exchange-traded funds or real estate investment trusts (such as fund operating expenses, management fees, redemption fees, 12b-1 fees and other fees and expenses. Further information regarding charges and fees assessed on Collective Investment Vehicles may be found in the appropriate prospectus or offering document) or other regulatory fees; (iv) brokerage commissions or other charges imposed by broker-dealers or entities other than the custodian if and when trades are cleared by another broker-dealer; (v) the charge to carry tax lot information on transferred mutual funds or other investment vehicles, postage and handling charges, returned check charges, transfer taxes; stock exchange fees or other fees mandated by law, and (vi) any brokerage commissions or other charges, including contingent deferred sales charges ("CDSC"), imposed upon the liquidation of "in-kind assets" that are transferred into the Client's account. EWA does not charge or participate in these fees.

The custodian of each of the Client's accounts may charge certain custodial fees. A custodian may charge a minimum account fee. Clients also may be charged for specific account services, such as ACAT transfers, electronic fund and wire transfer charges, and for other optional services elected by Clients. Accounts may be subject to transaction-based ticket charges assessed by the custodian for the purchase of certain mutual funds. Similarly, certain non-brokerage-related fees may be charged such as individual retirement account ("IRA") trustee or custodian fees and tax-qualified retirement plan account fees and annual and termination fees for retirement accounts (such as IRAs).

Some mutual funds assess redemption fees to investors upon the short-term sale of its funds. Depending on the particular mutual fund, this may include sales for rebalancing purposes. Please see the prospectus for the specific mutual fund for detailed information regarding such fees. In addition, a Client may incur redemption fees, when the portfolio manager to an investment strategy determines that it is in the Client's overall interest, in conjunction with the stated goals of the investment strategy, to divest from certain Collective Investment Vehicles prior to the expiration of the Collective Investment Vehicle's minimum holding period. Depending on the length of the redemption period, the particular investment strategy and/or market circumstances, a portfolio manager may be able to minimize any redemption fees when, in the portfolio manager's discretion, it is reasonable to allow a Client to remain invested in a Collective Investment Vehicle until expiration of the minimum holding period.

In connection with a Client's investment in ADRs, the Client could incur additional expenses and fees that are not included in the fees charged by EWA. For example, ADRs could be subject to dividend withholding taxes from the country of origin, which are an additional expense and reduce the dividend paid to the Client. The Client or Client's custodian is responsible for filing the appropriate forms/filings in the foreign country to reclaim any dividend withholding. In addition, paying agents

who process ADR dividend payments to a Client will assess a fee for their services, which also reduces the dividend paid to the Client.

EWA does not charge or participate in these Other Fees and these Other Fees are in addition to the fees paid by you to EWA. Additionally, EWA does not receive compensation in any fee-based accounts for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Termination

Pursuant to the EWA Client Investment Advisory Agreement (“Agreement”), EWA or Client can terminate the Agreement upon *thirty* (30) calendar days prior written notice to the other party. The Agreement with EWA can be canceled at any time, for any reason, upon receipt of *thirty* (30) calendar days prior written notice. Clients will receive a prorated refund of any pre-paid quarterly fee, based upon the number of days remaining in the quarter after the termination date. However, if the Client withdraws funds from their account but maintains their relationship with EWA and does not cancel the Agreement, then fees that were charged are non-refundable.

Additionally, if the Agreement is terminated, then the Client must either provide EWA with written instructions on how to move the Client’s assets and funds or speak with the custodian of the Client’s account directly on how to move the Client’s assets and funds. EWA does not have custody over the Client’s assets.

Item 6 – Performance-Based Fees and Side-By-Side Management

EWA does not charge any performance-based fees and does not engage in side-by-side management.

Item 7 – Types of Clients

EWA provides investment advisory services and financial planning to individuals, high net worth individuals, trusts, estates, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, and other U.S. institutions. EWA does not have any requirements for opening or maintaining an account, such as a minimum account size.

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

Methods of Analysis

EWA uses a broad range of quantitative and qualitative analysis in formulating investment advice, managing assets, and analyzing securities, investment strategies, and Funds. The quantitative analysis includes, but is not limited to: charting, fundamental analysis, technical analysis, and cyclical analysis. The qualitative analysis includes: reviewing financial and market news, inspections of corporate and fund activities, press releases, reports and regulatory filings, prospectus, corporate rating services, timing services, and research materials prepared by third-parties.

Analysis of Outside Managers

On rare occasions and upon a Client's explicit request, EWA can offer the use of an Outside Manager for Clients for portfolio management services. Our analysis of Outside Managers includes, but is not limited to: the evaluation of their experience, expertise, investment philosophies, investment strategies, past performance, compliance, and business enterprise risks. Each Outside Manager is evaluated on a Client-by-Client basis to determine if that Outside Manager's portfolio management services will be aligned with the Client's needs, goals and objectives. EWA monitors each Outside Manager's underlying holdings, investment strategies, performance, rebalancing and sector rotation results, exposure, and overall measurements of portfolio risk.

The risks associated with Outside Managers are in addition to all of the Risks detailed below.

Investment Strategy

EWA utilizes and recommends a variety of Investment Strategies to Clients that include strategic asset allocation, tactical asset allocation, a blend of strategic and tactical asset allocation, dollar-cost averaging, diversification, hedging, leveraging, volatility management, capital goals strategy, active and passive investment styles, growth and value investing styles, and income-oriented and tax-efficiency strategies. The Investment Strategy recommended or utilized for each Client is based on each Client's unique needs, goals and objectives. The variety of Investment Strategies utilized and recommended by EWA is a core tenet of its capability. Additionally, EWA uses proprietary analytical tools and commercially available optimization software applications to develop these Investment Strategies.

The initial investment strategy determined for each Client is based upon the unique needs, goals and objectives stated by the Client within the Investor Profile Questionnaire. After which, ongoing communication directly with each Client and ongoing monitoring of their portfolios will impact the recommendations and advice we provide to the Client regarding changes to their Investment Strategy. The Client can change their needs, goals and objectives at any time.

Sustainable Investment Strategies

On rare occasions and upon a Client's explicit request, EWA can offer Clients the use of various Sustainable Investment Strategies for their account(s) to build portfolios that align with Client values and interests. Sustainable investing refers to an investment philosophy that combines an intent to generate positive environmental and social impact alongside a financial return. Sustainable investing incorporates any of the following approaches: values alignment, ESG integration and thematic impact.

Investment Strategies utilized by EWA that integrate ESG factors in the investment process, as well as strategies that focus on a particular theme (e.g., environment, diversity, community, religious), are identified by EWA using data sourced from third-party research firms. EWA relies on the issuers and third-party research firms to verify and validate ESG investments and to identify impact focused investment strategies.

Investment Risks

Investing in securities involves risk of loss (including loss of principal) that each Client should be prepared to bear. Typical investment risks include market risk typified by a drop in a security's price due to company specific events (such as an earnings disappointment or a downgrade in the rating of a bond) or general market activity (such as occurs in a "bear" market when stock values fall in general). Stock markets, especially foreign markets, are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Fixed-income strategies are subject to interest rate risk and the inherent credit risk related to the underlying credit worthiness of the various issuers and the volatility of the bond market.

EWA utilizes and recommends a broad range of Investment Strategies. Some Investment Strategies may be high-risk strategies. Such strategies have the potential for substantial returns; however, there are corresponding significant risks associated with the strategies and they are not intended for all types of Clients. Clients who choose to follow high-risk strategies should be aware that there is the possibility of significant losses up to and including the possibility of the loss of all assets invested in accordance with the strategies. It is strongly recommended that Clients diversify their investments and do not have all of their investments in high-risk investment strategies.

Certain types of Investment Strategies and Funds have particular types of risk. Strategies that invest in international securities involve special additional risks, including currency risk, political risk, and risk associated with varying accounting standards. Investing in emerging markets may accentuate these risks. Investment Strategies that invest in small capitalized companies involve risks, including relatively low trading volumes, a greater degree of change in earnings and greater short-term volatility. Smaller companies typically have a higher risk of failure and are not as well established as larger blue-chip companies. Growth stocks can perform differently from the market as a whole and from other types of stocks and can be more volatile than other types of stocks. High-yield bond strategies invest in lower-rated debt securities (commonly referred to as junk bonds) and involve additional risks because of the lower credit quality of the securities in the portfolio. Clients should be aware of the possible higher level of volatility and increased risk of default. "Alternative" is an investment type that is not one of the three traditional asset types (stocks, bonds, and cash) and generally has low correlations to stocks and bonds. Alternative investments may have complex terms and features that are not easily understood and are not suitable for all investors. Concentrated, non-diversified or sector strategies investing more of their assets in a few holdings involve additional risks, including share price fluctuations, because of the increased concentration of investments. The lack of industry diversification subjects the Client to increased industry-specific risks. Finally, municipal investment strategies can be affected by adverse tax, legislative or political changes and the financial condition of the issuers of municipal securities. Certain ETFs are leveraged equity ETFs. The use of leverage by an ETF increases the risk to the portfolio. The more a portfolio invests in leveraged instruments, the more the leverage will magnify gains or losses on those investments. Due to the complexity and structure of these ETFs, they may not perform over time in direct or inverse correlation to their underlying index. Tactical and dynamic Investment Strategies involve more frequent trading than the traditional "buy-and-hold" investment strategies. Such trading can increase transaction costs and create more short-term tax gains than other types of strategies.

Risks that are associated with liquid alternative investments include leverage, shorting, security valuation, and nightly reconciliation. Risks that are associated with liquid alternative investments include: (1) Leverage—Leverage may enhance a fund's returns in up markets but exacerbate returns in a down market. Some firms with leverage inherent in their portfolios may experience "margin calls" in the event of liquidity dry-ups or if certain counterparties cannot provide the leverage needed; (2) Shorting—Certain securities may be difficult to sell short at the price that the manager would wish to execute a trade. A short position has the possibility of an infinite loss if a security continues to go up in price and the manager does not cover; (3) Security valuation—Certain securities held in alternative Funds, such as derivatives or thinly traded stocks, bonds or swaps may not have a market in which the money manager can trade it quickly to raise cash in case of fund redemptions. High bid/ask spreads or the lack of another buyer/seller to take the opposite position of a thinly traded security could cause inaccurate estimates in underlying security valuation by the administrator; and (4) Nightly reconciliation—The use of thinly traded securities, shorting and leverage may make it difficult for some alternative funds, based on their investment strategy, to provide accurate nightly NAVs for the mutual fund.

Liquidity Risk

Investing in certain types of securities that are thinly traded, or investing in bonds, or Funds that invest in thinly traded securities introduces liquidity risk. Liquidity risk is a financial risk that, for a certain period of time, a security or commodity cannot be readily traded in the market or cannot be traded without a significant discount to the market price. All tradable assets assume some level of liquidity risk. Alternative Funds may use techniques such as shorting of securities, leverage, and derivatives, all of which may have liquidity risks if there are no buyers and sellers available or if a counter party cannot fulfill the order.

Model and Data Risk

When investment models and data utilized by EWA prove to be incorrect or incomplete, any decisions made in reliance thereon expose clients to potential risks. All models rely on correct market data inputs. If incorrect market data is entered even into a well-founded model, the resulting valuations will be incorrect. However, even if market data is input correctly, "model prices" will often differ substantially from market prices, especially for securities with complex characteristics, such as derivative instruments.

ESG and Sustainable Risks

Incorporating ESG characteristics into the investment process carries the risk that the Sustainable and ESG portfolios may underperform as compared to non-impact or non-ESG focused strategies. The Sustainable and ESG considerations may reduce the investment universe or result in different exposures from funds or strategies that do not use such criteria. There is no guarantee that impact investment strategies will work under all market conditions, and each investor should evaluate their ability to invest long-term. In addition, EWA utilizes several third-party ESG research and ratings providers for portfolio management and reporting purposes. The scores, ratings, and assessments are subjective by nature, and may or



may not be accurate, complete, or reflect the beliefs of some investors. EWA depends on the information provided by third-party vendors. Any delay in the remittance of ESG information or sudden change in scores may cause the portfolio to hold companies that do not align with the impact methodology. While EWA attempts to update the portfolios in a timely manner, it cannot guarantee that the strategies will reflect the latest ESG information.

Tax-Managed Investing Risk

Market conditions may limit the ability to generate tax losses or to generate dividend income taxed at favorable tax rates. A tax-managed strategy may cause a client portfolio to hold a security in order to achieve more favorable tax treatment or to sell a security in order to create tax losses. The ability to utilize various tax-management techniques may be curtailed or eliminated in the future by tax legislation or regulation. The pre-tax performance of a tax-managed account may be lower than the performance of similar advisory account portfolios that are not tax-managed. The benefit of tax-managed investing to an individual investor is dependent upon the tax liability of an investor, which considers the level of prevailing tax rates. Over time, the ability of a Client in a tax-managed strategy to harvest losses may decrease and gains may build up in a securities portfolio. Tax-managed investing does not equate to comprehensive tax advice, is limited in scope, and not designed to eliminate taxes in an account. Mandates or the use of limits to restrict the amount of gains realized on a Client's total tax bill may severely restrict trading in the account and could result in substantial deviations from the investment allocation. EWA is not a tax accountant or lawyer. For detailed tax and law advice, please seek a professional consultation.

Tracking Error Risk

Tracking error risk refers to the risk that the performance of a Client portfolio may not match or correlate to that of the index it attempts to track, on a daily or aggregate basis. Factors such as fees and trading expenses, imperfect correlation between the portfolio's investments and the index, changes to the composition of the index, regulatory policies, and high portfolio turnover all contribute to tracking error. Tracking error risk may cause the performance of a Client portfolio to be less or more than expected.

Outside Manager Risks

On rare occasions and upon a Client's explicit request, EWA can offer the use of an Outside Manager for Client's portfolio management services. A risk of investing with an Outside Manager who has been successful in the past is that they may not be able to replicate that success in the future. EWA does not control the underlying investments in an Outside Manager's portfolio. Outside Managers may also deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for the Client.

Item 9 – Disciplinary Information

EWA and its officers, director members, partners, employees, representatives, subcontractors, agents, managers, or as the case may be, individually, or as a group (collectively referred to as "Representatives") have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 – Other Financial Industry Activities and Affiliations

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

Neither EWA nor its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Outside Managers Affiliations

On rare occasions and upon a Client's explicit request, EWA can offer the use of an Outside Manager for Client's portfolio management services. Clients pay a Wrap-Fee (as described in Item 5) when receiving portfolio management services from an Outside Manager. Clients are not obligated, contractually or otherwise, to use the services of any Outside Manager EWA recommends. Clients should consult the Outside Manager's Form ADV Part 2A for a fuller description of that Outside Manager's portfolio management services.

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

EWA Representatives covered by the EWA Code of Ethics ("Covered Persons") must, at a minimum, comply with all applicable legal requirements, including applicable federal and other securities laws. Covered Persons may be held personally liable for any improper or illegal acts committed during the course of their employment, and ignorance of laws and regulations is not a defense. Covered Persons must comply with the requirements of the U.S. Securities and Exchange Commission ("SEC") Rule 204A-1 under the Investment Advisers Act of 1940, as amended, which imposes certain code of ethics obligations on investment advisers registered with the SEC.

EWA's Code of Ethics subjects Covered Persons to standards of business conduct and imposes a requirement to acknowledge written receipt of the code and amendments thereto, and to report violations of the code. Covered Persons are also required to pre-clear trades before directly or indirectly acquiring beneficial ownership in a limited number of securities, namely, in a limited offering such as private placements, hedge funds, private equity funds and limited liability company interests. In addition, certain persons called "Access Persons" must pre-clear trades of additional securities before directly or indirectly acquiring beneficial ownership in (i) an initial public offering (ii) any exchange traded equity or fixed income security (excluding securities issued by the U.S. Federal Government or other foreign federal issuance), and (iii) any other securities placed on a restriction list by the Legal Department. When a pre-clearance request is submitted by an Access Person, a determination will be made as to the appropriateness of the transaction. If the trade appears unlikely to affect the market for the security, is clearly unrelated to the business of the Firm, and poses no conflict of interest with client trades, EWA's Chief Compliance Officer or authorized designee can grant approval. Access Persons also are required

to provide periodic reports regarding their personal securities activities, including initial and annual holdings reports and quarterly transactions reports. They are also required to provide confirmations (or have their brokers promptly submit duplicate confirmations) of all personal securities transactions to the EWA Compliance department and are required to obtain written approval before they can invest in a limited offering (such as a private placement) or an initial public offering.

EWA Representatives or related persons may have accounts with investment managers that are available to Clients as part of EWA's Advisory Business. In addition, EWA Representatives or related persons may personally buy or sell securities that Clients also own in their accounts. Investment decisions for EWA Representatives may not be made at the same time or in the same manner as those made for Clients. EWA or a related person of EWA may purchase or sell securities that are recommended or purchased or sold for Clients. Personal securities transactions by persons identified as Access Persons with EWA are subject to EWA's Code of Ethics. The Code of Ethics includes various reporting, disclosure, and approval requirements, described in the summary below. Envestnet designed these requirements to prevent or mitigate actual or potential conflicts of interest with Clients. The Code of Ethics applies not only to transactions by the individual, but also to transactions for accounts in which such person or the person's spouse, minor children or other dependents residing in the same household have an interest. Compliance with the Code of Ethics is a condition of employment at EWA.

In accordance with SEC rules governing investment advisors, EWA requires prompt reports of all securities transactions by Access Persons. EWA further requires that all brokerage account relationships of such individuals, and related persons living in the same household be disclosed, that EWA receive duplicate confirmations of transactions and custodial account statements, and annual certifications of compliance with the Code of Ethics from all Access Persons. Transactions in certain securities such as U.S. government securities, bankers acceptances, bank certificates of deposit, and commercial paper and shares of unaffiliated mutual funds are excluded from the reporting requirements.

The responsibilities of EWA's Chief Compliance Officer (or designee) include overseeing the regular monitoring and verification of compliance of Covered Persons with the requirements of the Code of Ethics, and reporting material violations to EWA's senior management. Covered transactions of the Chief Compliance & Ethics Officer are reviewed by another officer (or designee) of EWA. In addition to reporting and recordkeeping requirements, the Code of Ethics imposes various substantive and procedural restrictions on securities transactions for Access Persons. The Chief Compliance Officer may recommend to management the imposition of more severe sanctions, including suspension of personal investing privileges, or termination of employment, in the case of certain types of violations.

A copy of EWA's Code of Ethics can be obtained by contacting EWA at info@eaglewealthadvisor.com or +1 (860) 462-0796.

Item 12 – Brokerage Practices

EWA directs Clients to use particular executing broker-dealers and custodians and currently has relationships with two executing broker-dealers and custodians that provide brokerage, clearing and custody services to Clients. Not all advisers require their clients to direct brokerage to particular executing broker-dealers or custodians. By directing brokerage to particular executing broker-dealers or custodians, EWA may be unable to achieve the most favorable execution of Clients transactions, and this practice can cost Clients more money.

Clients can specify the use of particular executing broker-dealers and custodians that EWA does not have existing relationships with. By directing brokerage to particular executing broker-dealers or custodians, EWA may be unable to achieve the most favorable execution of Clients transactions, and this practice may cost Clients more money. For example, in a directed brokerage account, the Client may pay higher brokerage commissions because EWA may not be able to aggregate orders to reduce transaction costs, or the Client may receive less favorable prices.

The Custodians EWA Uses

Charles Schwab & Co., Inc. (“Charles Schwab”)
+1 (800) 435-4000
P.O. Box 982600
El Paso, TX 79998 USA

Altruist Financial LLC (“Altruist”)
+1 (888) 510-4660
PO Box 219069
Kansas City, MO 64121 USA

Clients will generally pay an asset-based fee for the brokerage, custody, and clearing services provided by the custodian (as opposed to transaction-based fees such as commissions). For certain custodial relationships, EWA is able to present the asset-based fee as part of the Client’s fee schedule in the client agreement. To the extent that such fees are not included in the fee schedule, the Client will be so informed in writing by EWA. Such fees may be charged directly to the Client or may be included within the overall cost of the security. Some of the custodians that EWA utilizes may apply minimum fees for Client accounts, which will be disclosed by the custodian to Clients in the applicable custodian’s account documentation.

Best Execution and Trading

EWA routes all trades resulting from Client transactions directly to the Client’s custodian(s) of record. EWA does not have a trade desk and executes trades directly with counterparties. EWA reviews the execution of trades for all Client accounts directly with the custodian(s) of record and maintains a Best Execution Committee. This review is documented in EWA’s written supervisory policies and procedures. EWA’s Best Execution Committee also periodically reviews the execution quality obtained on behalf of Clients for securities trades and any non-market orders submitted by EWA to the custodian for execution. In fulfilling its responsibilities, EWA is guided by applicable regulatory requirements and equitable treatment in trading such accounts.

Outside Manager Trading

EWA can offer the use of an Outside Manager for Clients for portfolio management services. Outside Managers have the authority to place orders for Client accounts with or through a broker-dealer other than the custodian of record designated by the Client, if Outside Manager believes that best execution of transactions may be obtained through such other broker-dealer. In such cases, commissions, or other compensation to the brokers in such transactions will be in addition to EWA's Fee.

Certain Third Party Model Providers that are utilized by Outside Managers, as disclosed in their Form ADV, may have a rotation policy that segregates their investment model updates from their directly managed accounts. If EWA determines that such trade rotation policy does not equitably treat Clients in accordance with Model Provider's reported performance, EWA will restrict the availability of the Model or impose additional requirements, as necessary.

Clients should review the Outside Manager's Form ADV Part 2A for information related to any such additional fees. Clients should carefully consider any additional trading costs the Client may incur before selecting an Outside Manager.

Soft Dollars

Soft dollar arrangements are any agreement, arrangement or understanding, whether written, verbal or otherwise, with a broker-dealer in which products or services are provided for free, or at a discount, and that are expressly or implicitly conditioned on the amount of trading directed to a particular broker-dealer.

EWA does not utilize any research or other services pursuant to a soft dollar arrangement.

Order Aggregation

EWA has the ability to aggregate orders, but only uses order aggregation on rare occasions, if at all.

Item 13 – Review of Accounts

Client account reviews are performed regularly by the assigned EWA investment advisory representative and that representative's supervisor. Client account reviews may also be performed more frequently when market conditions dictate.

Other conditions that trigger a review include changes in rules, laws, and regulations, new investment information, and changes in a Client's needs, goals and objectives

Clients receive statements from the custodian on record at least quarterly providing a detailed list of holdings with valuations and account activity as well as confirmations of all securities transactions. Clients receive periodic communications on at least an annual basis, and will receive an account statement and/or performance report no less than quarterly, and often monthly depending on the level of account activity.

Item 14 – Client Referrals and Other Compensation

EWA and related persons do not receive an economic benefit from anyone who is not a client for providing investment advice or other advisory services to our clients.

EWA and related persons do not directly or indirectly compensate any person who is not an EWA supervised person for client referrals.

Item 15 – Custody

EWA does not have custody of Client assets. The custodian(s) of record for the Clients account have custody of the Clients assets. Clients give custodians their authorization to pay EWA's management fees, pursuant to the Agreement and the account opening documentation with the custodian(s) of record. Clients will receive account statements on at least a quarterly basis from the custodian(s) of record and Clients should carefully review those statements.

EWA does not actively send account statements to Clients; however, Clients can request that EWA send them an account statement. EWA urges Clients to carefully review such statements and compare such official custodial records to the account statements provided to Clients. Statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Account statements created by EWA should not be construed as custodial account statements, nor should they be used in place of the Client's custodial statements.

Item 16 – Investment Discretion

Clients can grant EWA discretionary authority or non-discretionary authority when entering into an Agreement with EWA.

If Client grants EWA discretionary authority, then EWA accepts discretionary authority to manage securities accounts on behalf of Clients, pursuant to their Agreement and the Investment Strategy or Third Party Models selected by EWA, an appointed Outside Manager, and/or the Client. A limited power of attorney ("LPOA") is executed for this purpose pursuant to the Clients Agreement with EWA. EWA has the authority to invest, reinvest, purchase, buy, sell, exchange, convert, trade or otherwise deal (collectively referred to as "Trade"), including those Trades necessary or incidental to the furtherance or conduct of such Trade, with the Client's assets and securities in their discretion. However, EWA consults with the Client prior to each Trade to obtain concurrence if a blanket trading authorization has not been given.

If Client grants EWA non-discretionary authority, then EWA will contact the Client for approval in order to initiate a Trade within the Client's account.

Clients should promptly notify EWA if any investment needs, goals or objectives have changed at any time so that EWA can make appropriate changes within the Client's portfolio.

Item 17 – Voting Client Securities

EWA does not have authority to vote Client securities. Clients are expected to vote their own proxies.

Clients will receive their proxies or other solicitations directly from their custodian or transfer agent. Clients should review the custodians or transfer agents Form ADV Part 2A for information related to voting client securities.

If a Client account utilizes an Outside Manager, that Outside Manager may have authority to vote Client securities. Clients should review that Outside Manager's Form ADV Part 2A for more information related to voting client securities.

Clients can contact EWA with questions about a particular solicitation.

Item 18 – Financial Information

EWA does not have any financial impairment that will preclude the firm from meeting contractual commitments to Clients. A balance sheet is not required to be provided because EWA does not serve as a custodian for Client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, *six* (6) months or more in advance.

Item 19 – Requirements for State-Registered Advisers

EWA is registered with the Securities and Exchange Commission (“SEC”), and is not a State-Registered Advisor. EWA will provide notice filings where required for each State within the USA.



Eagle Wealth Advisors

44 Pumpkin Hill Road
Westport, CT 06880 USA
+1 (860) 462-0796

FORM ADV PART 2B BROCHURE SUPPLEMENT

January 7th, 2026

JOSEPH ROMANO

44 Pumpkin Hill Road
Westport, CT 06880 USA
+1 (860) 462-0796



This brochure supplement provides information about Joseph Romano that supplements the Eagle Wealth Advisors LLC (EWA) brochure. You should have received a copy of that brochure. Please contact Joseph Romano (CEO and CCO) at +1 (860) 462-0796 if you did not receive Eagle Wealth Advisors LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph Romano is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2 – Education Background and Business Experience

Born in 1962

EDUCATION

University of Buffalo 1980 – 1984
B.A Economics

BUSINESS EXPERIENCE

Eagle Wealth Advisors LLC – CEO	2021 – Present
Eagle Wealth Advisors LLC – Registered Investment Advisor	2019 – 2021
AEGIS Capital – Registered Investment Advisor	2015 – 2019
Cadaret, Grant & Company – Registered Investment Advisor	2005 – 2015
MONY Securities (n/k/a AXA Advisors LLC) – Registered Investment Advisor	1984 – 2005

ITEM 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

ITEM 4 – Other Business Activity

Joseph Romano is currently engaged in the below outside business activities. However, Joseph Romano will devote as much time to each client account as he deems appropriate to perform his duties:

1. Michael Riotto Design LLC, a commercial lighting company – Business Advisor
2. Brooklyn Heights Productions, a theatre and musical production company – CEO

ITEM 5 – Additional Compensation

1. Michael Riotta Design LLC – \$100,000
2. Brooklyn Heights Productions – \$0

ITEM 6 – Supervision

Joseph Romano, as CEO and CCO of EWA and who may be contacted via telephone at +1 (860) 462-0796, is responsible for complete oversight of Eagle Wealth Advisors LLC's (EWA) activities and supervision of his own activities. EWA maintains written policies and procedures for supervision. EWA's compliance manual is reviewed no less than annually. EWA utilizes a variety of surveillance programs to supervise its representatives including, but not limited to, programs that monitor digital messages, investment advice, management, trading activities, and other types of advisory activities. All EWA representatives certify to having received the compliance manual and participate in ongoing compliance training annually.

ITEM 7 – Requirements for State-Registered Advisers

Not Applicable



Eagle Wealth Advisors

44 Pumpkin Hill Road
Westport, CT 06880 USA
+1 (860) 462-0796

FORM ADV PART 2B BROCHURE SUPPLEMENT

January 7th, 2026

NICHOLAS ROMANO

1011 Washington Blvd, Unit 810
Stamford, CT 06901 USA
+1 (860) 462-8215

This brochure supplement provides information about Nicholas Romano that supplements the Eagle Wealth Advisors LLC (EWA) brochure. You should have received a copy of that brochure. Please contact Joseph Romano (CEO and CCO) at info@eaglewealthadvisor.com or +1 (860) 462-0796 if you did not receive Eagle Wealth Advisors LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Nicholas Romano is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 – Education Background and Business Experience

Born in 1997

EDUCATION

Boston University 2016 – 2018

B.S.B.A Business Administration and Management, Concentration in Finance

BUSINESS EXPERIENCE

Eagle Wealth Advisors LLC – COO	2023 – Present
Deloitte – Engagement Financial Advisor	2021 – 2023
Michael Riotto Design LLC – Financial Analyst / Procurement	2019 – 2021
Digilant – Financial Business Analyst	2018 – 2019

ITEM 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

ITEM 4 – Other Business Activity

Nicholas Romano does not engage in any outside business activities at this time.

ITEM 5 – Additional Compensation

Not Applicable



ITEM 6 – Supervision

Joseph Romano, as CEO and CCO of EWA and who may be contacted via telephone at +1 (860) 462-0796, supervises Nicholas Romano using a variety of surveillance programs including, but not limited to, programs that monitor digital messages, investment advice, management, trading activities, and other types of advisory activities. EWA also maintains compliance policies and procedures designed to detect and prevent violations of rules, regulations, and laws and Nicholas is required to certify compliance with these policies and procedures annually.

ITEM 7 – Requirements for State-Registered Advisers

Not Applicable