

**Eagle Investors LLC**  
**CRD #: 316259**

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**October 2025**

This “**Brochure**” provides information about the qualifications and business practices of Eagle Investors LLC (hereinafter “**Eagle Investors**,” “**we**,” “**us**,” “**our**” or the “**Firm**”). If you have any questions about the contents of this Brochure, please contact our Chief Compliance Officer (“**CCO**”), Ishaan Kumar Sandhir, by email at [info@eagle-investors.com](mailto:info@eagle-investors.com). Information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (the “**SEC**”) or by any state securities authority.

The firm’s publicly available website address is: [www.eagle-investors.com](http://www.eagle-investors.com)

Registration as an investment adviser does not imply that Eagle Investors or any of its principals or employees possesses a particular level of skill or training in the investment advisory business or any other business.

Additional information about Eagle Investors is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Material Changes**

This Brochure is Eagle Investors LLC's annual amendment as of 10/1/2025. There have been no material updates to this Brochure since its amendment in March 2025. Clients and prospective clients should carefully review the disclosures contained herein. This amendment also includes adjustments with the firm switching from SEC registration to State based Registration beginning in fiscal year 2024.

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**Item 4: Advisory Business**

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Eagle Investors LLC (hereinafter “**Eagle Investors**,” “**we**,” “**us**,” “**our**” or the “**Firm**”) is organized as an Indiana limited liability company with a principal place of business in Indianapolis, Indiana. Eagle Investors is principally owned by Eagle Horizon Ventures LLC. The firm has been incorporated since 2019 and the firm first became registered to provide investment advisory services in 2021 through SEC registration. However, due to ownership changes the firm is no longer registered with the SEC. The firm first became approved to provide investment advisory services on the State level in February 2024.

Eagle Investors provides investment research, financial advice, trading recommendations and investment recommendations regarding options, stocks, digital assets, and cryptocurrency trading to fee-based Subscribers (“Subscribers”) via the internet and through the firm's online platform. The online platform does not provide tailored investment advice to its Subscribers. The Firm does not manage subscriber accounts. Recommendations through the online platform are purely impersonal, and it is up to the client to decide if an investment is suitable.

Eagle Investors will also provide personalized financial advice and tailored investment advice through online voice and video calls to one-time fee-based Clients via the internet. This includes financial advice regarding options, stocks, fixed income, alternative assets, digital assets, and cryptocurrency trading and investment strategies. The Firm does not exercise discretion or custody of client funds, nor does the firm manage Subscribers or manage accounts.

Eagle Investors LLC provides both impersonal investment recommendations and personalized financial advice. Our team of advisors consists of licensed Investment Adviser Representatives, each holding the Series 65 license. This designation aids our advisors in meeting the regulatory qualifications necessary to provide investment advice and act in a fiduciary capacity.

Advisors engage with clients through online voice and video calls to provide non-discretionary, personalized financial advice tailored to each client's specific goals, risk tolerance, and investment preferences. Additionally, impersonal advice is provided to Subscribers through our online platform.

Eagle Investors LLC's investment advice is non-discretionary as the firm does not make investment decisions on client's behalf. Rather, the firm provides recommendations and guidance, leaving the final decision-making process and execution to the client. This non-discretionary advice is available to our Subscribers via ongoing fee- based subscription. This non-discretionary advice is also available to Clients via a one-time based fee. Due to the client maintaining full control of their accounts, it is the client's decision if they want to impose restrictions on investing in certain securities or types of securities.

We do not currently participate in any Wrap Fee Programs. Currently, we do not have regulatory assets under management, and we do not expect to maintain client assets under management.

The firm uses online voice and video calls such as Google Meets and/or Zoom to conduct 1 on 1 advising sessions and free consultations. 1 on 1 sessions are limited to investing and trading mentorships conducted by an investment advisor representative. 1 on 1 sessions include personalized financial advice. Clients are required to fill out a risk assessment before taking part in any 1 on 1 session or consultation. Although advice is personalized, the client maintains full control of their accounts.

The firm is using a Discord Server as an Online Platform to issue impersonal recommendations which include channels hosting trade recommendations. Some of the channels are utilizing AI for impersonal analysis for securities and a few alternative investments. The firm's advisory services related to online trading and investment advice for day traders, option traders, swing traders and investors including day trade alerts, swing trade alerts, stock alerts, 24x7 advice and AI generated stock Ideas, Breakout scanners, Dark pool, Scalp Ideas, Analyst Grades & Insider Orders.

The firm is also conducting impersonal educational group live streams regarding stock and option trading through the server/online platform.

#### **Item 5: Fees and Compensation**

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The fees applicable to Subscribers are set forth in detail in each membership agreement. A summary of such fees is provided below.

##### ***Subscription Fee***

Eagle Investors is paid a subscription fee ("Subscription Fees") for access to the online platform.

The Fee will range from \$67 monthly to \$670 annually (not a % or for management but for the subscription. The fee includes recommendations of digital assets and cryptocurrencies. Eagle Investors does not currently charge a performance-based fee for any investment recommendations, including those related to digital assets and cryptocurrencies. Fees are non-negotiable.

Fees are to be billed to clients via either Stripe or PayPal (online payment processors) only through a secure checkout process. The firm does not deduct fees from clients' assets at any time. Clients will only be billed according to their subscription plan: monthly subscribers will be billed once monthly, and annual subscribers will be billed once annually. Lower fees for comparable services may be available from other sources.

The Firm requires fees to be paid in advance. In the event of termination of this contract by either party or non-performance by the Adviser, the Adviser shall refund to the Client a prorated portion of any prepaid fees for services not yet rendered for annual subscribers only. The formula for calculating the prorated refund is as follows:

Annual

Refund Amount = ((Annual Fee / Days in Year) \* Days Remaining in Subscription Year) - Processing Fees

Processing Fees are defined as the standard 2.9% rate + \$0.30 per transaction cost for payments processed through Stripe, and the standard 3.49% + \$0.49 per transaction cost for payments processed through PayPal. PayPal purchases may also be subject to an additional 2% fee for refunds from the processor.

If the client chooses to terminate the contract within a five-business day period, the advisor can only charge for fees incurred prior to the termination excluding administrative fees, account set-up fees and minimum quarterly fees.

Eagle Investors LLC, in its sole discretion, may waive or modify the Subscription Fee for any Subscriber. This is limited to offering a discount at the discretion of the firm.

***One-Time Fee***

Eagle Investors is paid a one-time fee (“One-Time Fees”) for personalized financial advice and tailored investment advice through online voice and video calls.

The fee schedule is as follows:

Investment Advising - \$987, includes 3 Hours of 1 on 1 Advising & 3 Months of Eagle Premium

Trading Tutoring - \$987, includes 3 Hours of 1 on 1 Advising & 3 Months of Eagle Premium

Eagle Ultimate - \$2,497, includes 8 Hours of 1 on 1 Advising Sessions + Premium Annual

8 Hour 1 on 1 Advising Sessions: \$1,827 – price for existing subscribers only.

3 Hour 1 on 1 Advising Session: \$786 - price for existing subscribers only.

3 Hour 1 on 1 Advising Session: \$786 - price for existing subscribers only.

The above fees include recommendations and advice related to digital assets and cryptocurrencies and alternative investments. Eagle Investors does not currently charge a performance-based fee for any investment recommendations, including those related to digital assets and cryptocurrencies or alternative investments.

***Other Types of Fees or Expenses***

No other fees or expenses will be charged to clients in any fashion other than subscriptions and one-time fees described above. No custodian fees or mutual fund expenses will be billed to clients. Eagle Investors LLC. does not provide brokerage services.

The Firm is responsible for and shall pay, or cause to be paid, all their own ordinary administrative and overhead expenses, including, without limitation, all costs and expenses related to rent, furniture, fixtures, equipment, office supplies, clerical expenses and all salaries, bonuses and benefits paid to, or on behalf of, personnel of the Firm.

Neither the Firm nor its employees accept compensation from any third parties for the sale of securities or other investment products, including digital assets and cryptocurrencies.

Clients may incur other fees such as custodian fees or mutual fund expenses only if the client decides to use those vehicles. Custodian fees, mutual fund fees, and brokerage fees are not charged by the advisory and would be charged by an unaffiliated 3<sup>rd</sup> party. Please refer to Item 12 of the Brochure to learn more about the potential brokerage fees and transaction costs you may incur.

**Item 6: Performance-Based Fees and Side-By-Side Management**

We are not entitled to performance-based compensation. As a result, we do not face certain conflicts of interest that may arise when an investment adviser accepts performance-based fees from some clients, but not from other clients.

Eagle Investors LLC and its supervised person(s) do not accept performance-based fees at any time. The firm does not engage in side-by-side management.

**Item 7: Types of Clients**

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Our clients, as mentioned in Item 4 above, are Subscription or One-Time Fee based Customers. Eagle Investors LLC generally provides personalized and impersonal investment advice to individuals. The client may or may not have a brokerage account to be a subscriber. If the client maintains a brokerage account with a third party, there is no minimum account size to be a subscriber at Eagle Investors. Eagle Investors LLC does not have any requirements for opening or maintaining an account.

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

The descriptions set forth in this Brochure of specific advisory services that we offer to Clients and Subscribers, should not be understood to limit in any way our activities.

***Advisory Services:***

Impersonal Investment and Trading Education: Eagle Investors focuses on providing educational resources and impersonal investment and trading recommendations via its online platform. This includes video tutorials, market analysis reports, and live interactive sessions. The advice issued on the online platform is not tailored to individual circumstances and should not be construed as personalized recommendations.

Subscription-Based Access: Access to educational content, tools and recommendations are available through paid subscriptions, with two tiers: monthly and annual.

Personalized Investment Advice : Eagle Investors provides personalized financial advice and tailored investment advice through online voice and video calls to one-time fee-based Clients via the internet. In addition, Eagle Investors provides personalized advice through online voice and video calls on a free consultation . This includes financial advice regarding options, stocks, fixed income, alternative assets, digital assets, and cryptocurrency trading and investment strategies. The Firm does not exercise discretion or custody of client funds, nor does the firm manage Subscribers or manage accounts.

***Investment Strategies:***

Active Trading Analysis: Eagle Investors offers real-time trade alerts and recommendations for stocks, options, and cryptocurrencies. This suggests a focus on short-term, active trading strategies.

**Active Trading Strategies:**

These involve frequent buying and selling of securities, aiming to capitalize on short- and medium-term price movements. Common methods include:

Technical Analysis: Studying historical price charts and indicators to predict future price movements. This method relies heavily on past data and is not guaranteed to be accurate.

Fundamental Analysis: Evaluating a company's financial health, industry trends, and competitive landscape to assess its long-term value. This method requires substantial research and analysis.

**Day Trade, Swing Trade, and Stock Alerts:** Different alert categories target various investor timeframes and risk tolerances.

**Investment Timeframes:**

**Day Trading:** Buying and selling securities within the same trading day, aiming to profit from small price fluctuations. This carries high risk due to market volatility and requires significant experience and expertise.

**Swing Trading:** Holding securities for days or weeks, aiming to profit from larger price movements based on technical or fundamental analysis. This also carries risk and requires research and discipline.

**Investment:** Buying and holding securities for months to years; aiming to profit from larger price movements based on fundamental analysis. This Time frame takes patience and a long-term horizon.

**Risk and Considerations:**

All investment strategies involve risk, and some carry more risk than others. Before engaging in any active trading strategy, it's crucial to understand the potential risks involved:

**Market Volatility:** Prices can fluctuate rapidly, leading to significant losses.

**Liquidity Risk:** Certain assets may be difficult to buy or sell quickly, potentially leaving you exposed to price changes.

**Transaction Costs:** Frequent trading incurs commission fees and other costs, which can erode returns.

**Emotional Trading:** Making impulsive decisions based on fear or greed can lead to poor investment choices.

**Client Self-Direction:** Clients are ultimately responsible for making their own investment decisions based on the provided information and guidance.

***Paper or Simulated Trades:***

Eagle Investors LLC may employ the use of paper or simulated trading accounts to test or demonstrate investment strategies and concepts discussed on the Discord server. These simulated trades are intended for educational and illustrative purposes only and should not be interpreted as actual investment recommendations. Clients should exercise caution and consider the inherent limitations of simulated trading when evaluating the potential outcomes of the strategies discussed.

***Investment Objective***

While individual investment objectives vary, the firm aims to provide detailed analysis and advice for active and passive traders to generate returns in both the capital and derivatives marketplace.

***Risk Management***

While we do not manage any funds, individuals must manage their own risk. The firm focuses on diversification, limited exposure, position sizing, and management to mitigate risk.

on posted trade recommendations, and for general portfolio guidelines.

#### **Important Disclosure Regarding Securities Risks**

Investing in securities involves inherent risks, and every investment carries the potential for loss. It is crucial for clients to understand and be prepared to bear these risks before making any investment decisions.

At Eagle Investors, we provide educational resources and investment guidance, but the ultimate responsibility for investment choices lies with our Subscribers. We strongly encourage you to:

Conduct thorough research: Analyze individual securities, market trends, and your personal financial situation before committing any capital.

Diversify your portfolio: Spreading your investments across different asset classes and sectors can help mitigate risk.

Understand your risk tolerance: Only invest in financial products with risk levels you are comfortable with, considering your financial goals and time horizon.

Seek professional advice: Consult with a qualified financial advisor for personalized guidance tailored to your unique circumstances.

Remember, past performance is not a guarantee of future results. Unforeseen events, market fluctuations, and economic factors can all impact the value of your investments. While we strive to provide insightful resources and analysis, there is no guaranteed path to success in the investment landscape.

By remaining informed, prepared, and mindful of the risks involved, you can make informed investment decisions that align with your financial goals and risk tolerance.

#### **The Risks of Publicly Traded Stocks:**

**Market Risk:** Stock prices fluctuate based on various factors, including company performance, industry trends, and overall market sentiment. A down market can lead to significant losses.

**Company Risk:** A company's financial health, management decisions, and competitive landscape can all impact on its stock price. A company can go bankrupt, leading to a complete loss of your investment.

**Liquidity Risk:** While many stocks trade on major exchanges, some may have lower liquidity, making it difficult to sell your shares quickly without potentially incurring a loss.

**Inflation Risk:** Over time, inflation can erode the purchasing power of your returns from stocks. Dividends may not keep pace with inflation.

**Event Risk:** Unforeseen events, such as natural disasters, political upheavals, or industry-specific crises, can cause stock prices to plummet.

#### **The Risks of Fixed Income (Bonds):**

**Interest Rate Risk:** As interest rates rise, bond prices generally fall (and vice versa). If you need to sell a bond before maturity, you might receive less than you paid for it.

**Credit Risk:** The issuer of a bond (government or corporation) may default on their obligation to repay the principal or make interest payments. This risk is higher for lower-rated

(high-yield) bonds.

**Call Risk:** Some bonds have callable provisions, allowing the issuer to redeem the bond before maturity. This can happen if interest rates fall, forcing you to reinvest your principal at a lower rate.

**Inflation Risk:** Similar to stocks, fixed income is also susceptible to inflation erosion. Fixed coupon payments may not keep pace with rising prices.

**Liquidity Risk:** While some bonds, like Treasuries, are highly liquid, others may be less tradable, making it difficult to sell them quickly when needed.

### ***Risk of Loss Factors***

The following risk factors do not purport to be a complete list or explanation of the risks involved in an investment advised by us. These risk factors include only those risks we believe to be material, significant or unusual and relate to significant investment strategies or methods of analysis employed by us.

An investment involves significant risks and is suitable only for those persons who can bear the economic risk of the loss of their entire investment, and who have limited need for liquidity in their investment. There can be no assurances that we will achieve our investment objectives. An investment carries with it the inherent risks associated with investments in publicly traded stocks and bonds, options, and related instruments, including, without limitation, the risks described below. Each Subscriber should carefully review their subscription documents and any documents referred to herein before deciding to subscribe with Eagle Investors.

### **Important Disclosure Regarding Active Trading Strategies**

Active trading strategies like day trading and swing trading involve frequent buying and selling of securities, aiming to capitalize on short-term market movements. While they hold the potential for high rewards, they also come with inherent material risks:

#### **Market Risk:**

**Volatility:** Active trading thrives on volatility, but it's a double-edged sword. Unexpected swings can quickly turn profits into losses.

**Sudden Events:** News, economic data releases, or geopolitical events can trigger sharp price movements, catching traders off guard and leading to significant losses.

#### **Trading Costs:**

**Commissions and Fees:** Frequent buying and selling can incur high commission fees and trading costs, eating into potential profits.

**Bid-Ask Spread:** The difference between the buying (bid) and selling (ask) price can be a significant hurdle, especially for short-term trades.

**Psychological Risks:**

**Emotional Trading:** The fast-paced nature of active trading can lead to impulsive decisions based on fear or greed, jeopardizing sound judgment.

**Overtrading:** The urge to capitalize on every opportunity can lead to excessive trading, increasing costs and diminishing returns.

**Time Commitment:**

**Active Monitoring:** Successful active trading requires constant monitoring of markets, news, and charts, making it a time-intensive endeavor.

**Limited Diversification:** Active traders often focus on a smaller pool of assets to identify short-term opportunities, potentially missing out on broader market gains.

**Risk Specific to Strategy:**

**Day Trading:** Day traders hold positions for very short periods, amplifying the risks of market volatility and emotional trading. They also miss out on potential long-term gains.

**Swing Trading:** Swing traders hold positions for a bit longer, reducing some volatility risk but still susceptible to overnight gaps and sudden price movements. They may also miss out on longer-term trends.

Overall, active trading strategies are best suited for experienced investors with a high tolerance for risk, strong discipline, and the time to dedicate to constant market monitoring. It's crucial to have a well-defined trading plan, risk management techniques in place, and a deep understanding of the markets before venturing into active trading.

**Important Disclosure Regarding Alternative Investment Risks**

Before considering any alternative investments recommended by Eagle Investors, it's crucial to understand the inherent and potentially amplified risks involved compared to traditional securities. While some benefits may exist, these investments are not suitable for all investors and require a high degree of risk tolerance and financial sophistication.

**Key Risks to Consider:**

**Limited Liquidity:** Unlike publicly traded securities, many alternative investments lack readily available markets for buying or selling, making them highly illiquid. Accessing your invested capital may be difficult or impossible, potentially locking your funds for extended periods.

**Higher Fees and Expenses:** Compared to traditional investment vehicles, alternative investments often come with significant upfront fees, ongoing management fees, and performance-based fees. These charges can significantly erode returns and eat into your overall investment performance.

**Complex Structures and Valuation Difficulties:** Understanding the underlying assets and investment strategies employed in alternative investments can be challenging. Assessing their true value can be even more complex due to limited transparency and subjective valuation methods.

**Higher Volatility and Potential for Loss:** Alternative investments generally exhibit greater

volatility than traditional options, leading to increased potential for significant losses. Market corrections, economic downturns, or specific project setbacks can have a disproportionate impact on your investment capital.

**Regulatory Oversight and Limited Investor Protection:** Compared to traditional securities, alternative investments often receive less regulatory oversight and investor protection. This can increase your exposure to fraud, mismanagement, or operational inefficiencies within the investment vehicle.

**Additional Considerations:**

**Tax Implications:** Alternative investments can have complex tax structures, leading to unexpected tax liabilities or reporting requirements.

**Suitability:** Due to the heightened risks involved, alternative investments are generally only suitable for accredited investors with high net worth and the financial capacity to withstand significant losses. Ensure you meet the eligibility criteria and thoroughly assess your risk tolerance before committing any capital.

We strongly urge you to carefully consider your risk tolerance, investment goals, and financial situation before investing in any alternative investment recommended by Eagle Investors. Conduct thorough research, seek personalized financial advice, and fully understand the specific risks associated with each offering before making any investment decisions. Remember, past performance is not indicative of future results, and no guaranteed path to success exists in the investment landscape. Eagle Investors LLC does not currently have any relationships or affiliations with issuers of Alternative Investments.

#### **Important Risk Disclosure Regarding Digital Asset & Cryptocurrency Risks**

Eagle Investors provides educational resources and investment guidance on various asset classes, including digital assets and cryptocurrencies. Digital assets involve significant risks that investors should be aware of before making any investment decisions. This disclosure aims to highlight some of the material risks associated with digital assets and cryptocurrencies:

**Volatility:** The digital asset market is notoriously volatile, experiencing rapid price fluctuations due to various factors like news, regulations, and supply/demand dynamics. This volatility can lead to significant losses in a short period, making it unsuitable for risk-averse investors.

**Lack of Regulation:** Unlike traditional assets like stocks and bonds, digital assets are largely unregulated in many jurisdictions. This lack of oversight exposes investors to potential fraud, manipulation, and scams.

**Technological Risks:** Digital assets rely on complex blockchain technology, which is still evolving and prone to technical glitches, hacking attacks, and system failures. These risks can result in loss of funds or unauthorized access to your holdings.

**Security Risks:** Storing and transacting with digital assets often involves online wallets and exchanges, which can be vulnerable to hacking and cyberattacks. Additionally, individual user errors, like losing private keys, can lead to permanent loss of access to your holdings.

**Limited Liquidity:** Compared to traditional assets, digital assets often have limited liquidity, making it difficult to buy or sell them quickly without impacting the price. This can be

especially problematic during market downturns when investors may need to exit their positions.

**Legal and Regulatory Uncertainty:** The legal and regulatory landscape surrounding digital assets is constantly evolving, creating uncertainty for investors. Changes in regulations could negatively impact the value and accessibility of these assets.

**Environmental Impact:** Mining cryptocurrencies requires significant energy consumption, raising concerns about their environmental impact. This factor may pose ethical and financial risks for investors in the long term.

**Tax Implications:** The tax treatment of digital assets varies depending on jurisdiction and individual circumstances. Investors should consult with a tax advisor to understand the potential tax implications of investing in these assets.

**Potential for Loss:** Investing in digital assets and cryptocurrencies involves the risk of losing your entire investment. This disclosure is not intended to discourage investment in these assets but rather to emphasize the importance of careful consideration and risk management before making any investment decisions.

**Impersonal Advice:** Before investing in digital assets or cryptocurrencies, we strongly encourage you to consult with a qualified financial advisor who can assess your individual risk tolerance and investment goals and develop a suitable investment strategy that aligns with your needs.

By understanding these risks and making informed decisions, you can approach the digital asset and cryptocurrency market with a greater degree of caution. Eagle Investors remains committed to providing our clients with comprehensive and objective information about various investment options.

#### **Important Risk Disclosure Regarding Options & Leveraged Trading**

Options are not suitable for all investors as the special material risks inherent to options trading may expose investors to potentially rapid and substantial losses. Options involve risks and are not suitable for everyone. Prior to buying or selling options, an investor must receive a copy of the Characteristics and Risks of Standardized Options. Copies may be obtained by contacting your broker, The Options Industry Council at One North Wacker Drive, Chicago, IL 60606, or by visiting [www.OptionsEducation.org](http://www.OptionsEducation.org)

Options and leverage trading offer enticing possibilities for amplified returns, but they come with significant material risks. Here's a breakdown of the key dangers to be aware of:

#### **Leverage Risk:**

**Magnified Losses:** Leverage amplifies not just gains but also losses. A small price movement against your position can lead to a much larger loss than your initial investment.

#### **Options-Specific Risks:**

**Time Decay (Theta):** Options lose value over time as they approach their expiration date. This means even if the underlying asset price moves in your favor slightly, you might still lose money if an option you bought expires before you exercise it.

**Volatility:** Options are highly sensitive to market volatility. If volatility increases unexpectedly, the price of your options can fluctuate dramatically, potentially leading to significant losses.

**Complexity:** Options strategies can be intricate and involve multiple factors beyond just the price movement of the underlying asset. Understanding these complexities is crucial to managing risk.

**Expiration:** Options contracts have expiration dates. If the option expires unexercised, the entire premium paid for the option is lost.

#### **Other Risks:**

**Counterparty Risk:** There's a risk that the other party to your options contract may default on their obligations. This can happen if the option writer goes bankrupt, for instance.

**Early Assignment:** In some cases, the option writer may exercise (sell or buy) the option early, which can disrupt your trading strategy.

**Liquidity:** Options on less popular assets may have lower liquidity, making it difficult to enter or exit a position quickly without potentially incurring significant losses.

Options and leverage trading are not suitable for all investors. If you're considering these strategies, it's vital to thoroughly understand the risks involved, carefully assess your risk tolerance, and potentially seek guidance from a qualified financial advisor.

All users of Eagle Investors LLC content and/or web platforms must determine for themselves what specific investments to make or not to make and are urged to consult with their own independent financial advisors with respect to any investment decision. The viewer bears responsibility for his/her own investment research and decisions, should seek the advice of a qualified securities professional before making any investment, and investigate and fully understand all risks before investing. All opinions, analysis, and information included in this Content and on the website are based on sources believed to be reliable and written or produced in good faith but should be independently verified, and no representation or warranty of any kind, express or implied, is made, including but not limited to any representation or warranty concerning accuracy, completeness, correctness, timeliness, or appropriateness. In addition, Eagle Investors, LLC. undertake no responsibility to notify such opinions, analysis, or information or to keep such opinions, analysis, or information current. Also be aware that owners, employees, writers, or producers of and for Eagle Investors, LLC. may have long or short positions in securities that may be discussed in the Content or on the website. Past results are not indicative of future profits.

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#### **Item 9: Disciplinary Information**

Eagle Investors LLC is not aware of any disciplinary or legal events for us or our management persons reportable under this item that are material to a clients or prospective clients evaluation of our advisory business or the integrity of our management.

Eagle Investors LLC has never been subject to any criminal or civil actions, administrative proceedings, or SRO proceedings.

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**Item 10: Other Financial Industry Activities and Affiliations**

Neither we nor our management persons are registered as broker-dealers, and neither of us has any application pending to register with the SEC as a broker-dealer or registered representative of a broker-dealer, respectively. In addition, nobody associated with Eagle investors LLC as a principal or management persons is registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor in any association.

***Professional Relationships***

The firm along with its management personnel, maintains no arrangements with any other related parties to the following type: Broker-dealers, municipal securities dealers, government securities dealers or brokers, Investment companies or other pooled investment vehicle, futures commission merchants, commodity pool operators, or commodity trading advisors, banking or thrift institutions, Insurance companies or agencies, pension consultants, real estate brokers or dealers.

Eagle Investors LLC maintains a professional affiliation with Eagle Guardian Advisors LLC, a state-registered investment advisor based in Texas. Eagle Guardian Advisors LLC provides financial planning and portfolio management services to retail and institutional clients. While both firms operate independently, they share common ownership and supervised persons.

Eagle Investors LLC does not receive referral fees or direct compensation for any client relationship with Eagle Guardian Advisors LLC. Any recommendations or referrals are made in the best interest of the client, and clients are under no obligation to engage with Eagle Guardian Advisors LLC or any affiliated entity.

Eagle Investors LLC remains committed to acting in a fiduciary capacity and upholding a duty of loyalty and care in all advisory relationships. Clients with questions about these affiliations or potential conflicts of interest are encouraged to contact us directly for more information.

The firm does not receive compensation directly or indirectly for any recommendations on investment advisers at any time, therefore eliminating any conflict of interest that could arise from that type of arrangement.

Eagle Investors LLC does not have any relationships or affiliations with issuers of Alternative Investments. If any affiliation or relationship exists in the future that could potentially cause a conflict of interest, Eagle Investors LLC will provide the necessary disclosures.

Ishaan K. Sandhir & Maikel Den Hertog serve as supervised persons and investment advisor representatives for Eagle Guardian Advisors LLC.

Ishaan K. Sandhir serves on the board of directors of The Envision Capital Management Group, a 501c3 nonprofit that educates students at Indiana University. The charitable fund teaches students how to invest and donates 50% of all returns to underprivileged students at the university. The Envision Capital Management Group is incorporated separately and operates completely independently from Eagle Investors LLC. Ishaan is not involved with day-to-day operations or investment decisions of the charity.

Ishaan K. Sandhir serves as the president of the board of directors of Summit Impact Trust a 501c3 nonprofit trust that invests an endowment and donates the returns to 501c3 nonprofit corporations.

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

Eagle Investors LLC has adopted a comprehensive **Code of Ethics** that reflects our commitment to the highest standards of integrity, fiduciary responsibility, and transparency in all aspects of our operations. This Code sets expectations for personal conduct and outlines strict procedures governing employees' personal trading activity.

All employees are required to certify their adherence to the Code of Ethics at the start of employment and on an annual basis. Additionally, employees must submit **quarterly compliance attestations**, including verification of personal trading activity and confirmation that they have not been in possession of material non-public information during the relevant period.

Our Code of Ethics is publicly available at: <https://eagle-investors.com/code-of-ethics/> As Eagle Investors utilizes platforms such as **Discord and other communication channels**, there may be scenarios where employees share real or hypothetical trading examples. To ensure these communications align with our fiduciary duty:

- All trade-related posts must be **substantiated and reviewed** by compliance staff.
- Employees are subject to ongoing training on what constitutes a recommendation and the regulatory boundaries of personal and client trading.
- Quarterly attestations are required to confirm that all communications are in full compliance and free from undisclosed conflicts or material non-public information.

***Affiliated Investment Advisor***

Eagle Investors LLC maintains an affiliated relationship with **Eagle Guardian Advisors LLC**, a Texas-based Registered Investment Advisor that provides services such as **portfolio management and financial planning**, which are **not offered by Eagle Investors LLC**.

While the two firms share **common ownership**, they operate as **distinct legal entities** and serve different advisory roles. From time to time, Eagle Investors LLC may refer clients to Eagle Guardian Advisors LLC when those services are more aligned with the client's needs. These referrals are made **solely in a fiduciary capacity**, and Eagle Investors LLC does **not receive any referral fees, compensation, or other financial benefit** from such referrals.

We recognize the potential for perceived or actual conflicts of interest arising from this relationship. To mitigate such risks, Eagle Investors LLC has implemented the following safeguards:

- **No compensation** is exchanged between the firms for referrals.
- All recommendations are made with the client's **best interest as the primary consideration**.
- We maintain a clear separation of operations, compliance systems, and decision-making processes between the firms.
- Clients are fully informed of this relationship and are under **no obligation** to engage with Eagle Guardian Advisors LLC.

We remain committed to upholding our fiduciary duty and ensuring that no affiliated relationship interferes with the objective delivery of services to our clients.

***Addressing Personal Trading Conflicts:***

- ***Disclosure of Personal Positions: Employees must disclose any personal position in securities that may overlap with client trades.***
- ***Execution Priority: Personal trades are executed in a way that minimizes potential market impact and ensures client accounts are prioritized.***
- ***Ongoing Monitoring: All personal trading activity is reviewed and monitored by compliance to identify and manage any potential conflicts.***

### ***Simultaneous Investment Conflicts***

- **Investment Guidelines:** Clear internal guidelines govern investment activity to ensure fair and consistent treatment of all clients.
- **Fair Allocation:** When employees and clients invest in the same security, trade execution is prioritized for client accounts, and internal alerts ensure timely, transparent action.
- **Compliance Reviews:** Regular reviews of employee and client trades are conducted to detect and resolve any conflicts of interest.

### ***Addressing Simultaneous Investment Conflicts:***

Communication and Disclosure: In any scenario where client and employee orders overlap for the same security, we actively communicate with clients to ensure full transparency and address any concerns.

Compliance Review: We regularly review investment activity to identify and address any potential conflicts arising from simultaneous investments.

### ***Disclosing Potential Conflicts of Interest***

Eagle Investors LLC strives to be fully transparent about all actual and potential conflicts of interest. As part of this commitment:

- Personal Trading Conflicts: While employees may engage in personal trading, strict policies and monitoring are in place to prevent any adverse impact on client portfolios.
- Simultaneous Investment Conflicts: We disclose and monitor scenarios where employee and client investments may overlap, taking steps to ensure fair treatment of clients.
- Broker-Dealer Compensation: We do not receive soft-dollar benefits or referral compensation. While we consider execution quality, commission rates, and cost efficiency in choosing broker-dealers, we do not accept incentives that could compromise our objectivity.

### ***Material Conflicts of Interest***

Personal Trading Conflicts (Item 11.C): Our employees may engage in personal trading, and while we have strict policies to mitigate potential conflict, in rare circumstances, personal trading could conflict with our recommendations for client portfolios.

Simultaneous Investment Conflicts (Item 11.D): Our employees may invest in securities similar to or at the same time as our clients. We have policies to ensure client accounts are prioritized, but the potential for conflict exists.

Compensation from Broker-Dealers (Item 12): While we do not accept soft-dollar benefits or

client referrals, we do consider factors such as commission rates and transaction costs when selecting broker-dealers, which could create a potential conflict of interest.

All Material Conflicts of Interest have been disclosed in this brochure.

### ***Additional Disclosures***

We do not recommend securities in which we or our related persons have a material financial interest. We have implemented policies and procedures to address personal trading by employees and potential investment overlaps.

We disclose any potential conflict of interest to clients promptly and with transparency.

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### **Item 12: Brokerage Practices**

At this time Eagle Investors does not engage in general securities transactions for Subscribers. However, the firm provides impersonal brokerage service recommendations in relation to the investments that are recommended to clients.

#### ***Broker-Dealer Selection and Compensation Practices***

At Eagle Investors LLC, we understand the importance of selecting and recommending broker-dealers that prioritize our clients' best interests when executing their securities transactions. We are committed to transparency and ethical conduct, and we disclose here our practices regarding broker-dealer selection, compensation, and potential conflicts of interest.

##### **1. Research and Other Soft Dollar Benefits:**

We do not accept research or other products or services (soft dollar benefits) from broker-dealers in connection with client brokerage and securities recommendations. Therefore, we avoid any conflicts of interest that could arise from receiving such benefits.

##### **2. Brokerage for Client Referrals:**

We do not consider client referrals from broker-dealers when selecting or recommending them. Our broker selection process is purely based on objective criteria that prioritize best execution for our clients, such as:

Commission rates and transaction costs: We seek competitive commission rates and minimize transaction costs.

Order execution quality: We favor broker-dealers with a proven record of achieving best execution for client orders.

Financial stability and reputation: We choose reputable and financially stable broker-dealers to ensure the safekeeping of client assets.

##### **3. Directed Brokerage:**

Clients are not required or encouraged to direct brokerage through a specific broker-dealer. They have the freedom to choose their preferred broker-dealer, and we strive to ensure they receive the highest quality advice execution regardless of their choice. If a client decides to use a third-party brokerage, they may incur separate fees for buying/selling assets unrelated to the investment adviser.

**Transparency and Disclosure:**

We regularly review and update our broker selection process to ensure its alignment with best practices and regulatory requirements.

We are committed to open communication with our clients and readily answer any questions about our broker selection and compensation practices.

By adopting these practices, Eagle Investors LLC upholds its commitment to client-centricity and prioritizes achieving the best possible outcomes for your investments.

Here is a list of domestic and international broker-dealers and charting software options we have vetted:

***Domestic USA:***

Charles Schwab/TOS (Charles Schwab, ThinkOrSwim): Offers a well-rounded platform with competitive commission rates, extensive research tools, and a user-friendly interface.

TastyWorks: Known for its low commissions, options-focused features, and active trading community.

WeBull: A commission-free platform with access to a wide range of asset classes and advanced charting tools.

E\*Trade: Provides a popular platform with user-friendly features, educational resources, and access to fractional shares.

Trade Station: Combines powerful charting tools with advanced order routing and back testing capabilities.

***International Brokers:***

IBKR - Interactive Brokers: A global leader offering access to diverse markets, low commissions, and sophisticated trading tools.

QuesTrade (Canada): A popular Canadian platform with competitive commission rates and a user-friendly interface.

TastyWorks (Select Countries): Expanding their international reach with its low-commission options platform.

***Charting Software:***

Tradingview.com: Renowned for its powerful charting tools, technical indicators, and global market coverage.

WeBull: Offers advanced charting within its commission-free platform, suitable for both beginners and experienced traders.

TDA/TOS (TD Ameritrade, ThinkOrSwim): Provides market-leading charting capabilities and advanced technical analysis tools within both platforms.

Please note: This list is not exhaustive, and the suitability of a specific broker-dealer or charting software depends on your individual investment goals, risk tolerance, and trading style. We encourage you to do your own research and consider additional factors before deciding.

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***Item 13: Review of Accounts and Research***

Our Firm Management continuously monitor and analyze the research we provide to ensure that it conforms with our internal compliance manual and each Subscriber's advisory contract.

The Firm, its management and advisor(s) do not periodically review client accounts or financial

plans.

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**Item 14: Client Referrals and Other Compensation**

We do not receive economic benefits from non-Subscribers for providing investment advice and other advisory services. Neither we, nor any of our related persons, directly or indirectly, compensate any person who is not a supervised person for Subscribers referrals.

Affiliate Relationship Disclosure – TRADINGVIEW, INC.

Eagle Investors LLC maintains an affiliate relationship with TradingView, a technology platform offering advanced charting tools for technical analysis. As part of this relationship, members who sign up for TradingView through our affiliate link receive a discount, and Eagle Investors receives a small affiliate commission (approximately 10%) from the sale.

We have recommended TradingView for years prior to establishing this affiliate relationship, as we believe it provides significant value to our clients for technical analysis and educational purposes. Entering into this affiliate arrangement aligns with our commitment to act in the best interest of our clients, offering them an opportunity to access these tools at a discounted rate.

This affiliate arrangement does not create a conflict of interest, as TradingView is not a brokerage, investment advisory firm, or a provider of securities-related services. It is solely a software provider used for educational and analytical purposes to aid technical analysis. Our recommendations are based solely on the merit of the tools and their value to our Subscribers, without influence from this relationship.

Eagle Investors is committed to transparency and ensuring that all disclosures align with our fiduciary responsibility to act in our clients' best interests.

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**Item 15: Custody**

Eagle Investors does not have physical custody of any Subscriber funds and/or securities and does not take custody of Subscriber accounts at any time. However, the firm does require the prepayment of fees more than \$500 per client and for six months or more in advance in certain circumstances if a client chose to be billed on annual basis. Due to this, the firm is bound to its home states certain custody requirement which requires a positive net worth. The firm is in compliance with the home state's specific requirement.

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**Item 16: Investment Discretion**

Eagle Investors does not have a discretionary relationship with any of its Subscribers.

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**Item 17: Voting Client Securities**

Eagle Investors does not hold securities and therefore, is not required to vote any applicable proxies. The firm has not and will not accept authority to vote client securities at any time.

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**Item 18: Financial Information**

The firm solicits prepayment of more than \$500 in fees per client, six months or more in advance in certain cases when a client elects to be billed on an annual basis. Therefore, in certain cases we are required to include a balance sheet for our most recent fiscal year.

Eagle Investors LLC. does not have any financial condition reasonably likely to impair our ability to meet contractual commitments to clients.

Eagle Investors LLC. has not been the subject of a bankruptcy petition at any time during the past ten years.

The firm's most recent balance sheet has been attached to the following page:

**EAGLE INVESTORS LLC**  
Balance Sheet

As of February 18th, 2025

**Assets**

**Current Assets**

Cash and cash equivalents	\$24,151.28
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Accounts Receivable	-
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Prepaid Expenses	\$2,949.18
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<b>Total Current Assets</b>	<b>\$27,100.46</b>
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Investments

Ninja Trader	\$2,000.00
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<b>Total Long-Term Assets</b>	<b>\$2,000.00</b>
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<b>Total Assets</b>	<b><u>\$29,100.46</u></b>
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**Liabilities**

**Current Liabilities**

Accounts Payable	-
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Credit Card Payable	\$36.39
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Business Tax Payable	\$545.46
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Unearned Revenue	\$16,837.00
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<b>Total Current Liabilities</b>	<b>\$17,418.85</b>
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<b>Total Liabilities</b>	<b><u>\$17,418.85</u></b>
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<b>Members' Equity</b>	<b>\$11,681.61</b>
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<b>Total Members' Equity</b>	<b>\$11,681.61</b>
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<b>Total Liabilities and Members' Equity</b>	<b><u>\$29,100.16</u></b>
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**Item 19: Requirements for State-Registered Advisers**

Ishaan Kumar Sandhir – Chief Executive Officer & Managing Member Educational Background: B.S. in Entrepreneurship & Corporate Innovation, Indiana University – Bloomington , Currently Pursuing CFA (Past 5 Years): Chief Executive Officer, Eagle Guardian Advisors LLC (2025 – Present) Executive Managing Partner, Eagle Horizon Ventures LLC (2025 – Present) Chairman, Board of Directors – Envision Capital Management Group (2023 – Present) Founder, Eagle Investors LLC (2023 – Present) Other Business Activities: Mr. Sandhir

is also President of the Board of Directors of Summit Impact Trust, a 501(c)(3) nonprofit trust, and Executive Managing Partner of Eagle Horizon Ventures LLC, a private equity firm. These entities operate independently but are under common ownership. Mr. Sandhir devotes the majority of his professional time to Eagle Guardian Advisors LLC and related entities. Performance-Based Fees: Mr. Sandhir does not charge performance-based fees at this time. Disciplinary Information: Mr. Sandhir has no reportable disciplinary history. Conflicts of Interest: Mr. Sandhir may refer clients between affiliated firms when appropriate and in a fiduciary capacity. No compensation or referral fees are exchanged. Policies are in place to mitigate potential conflicts. Bankruptcy Disclosure: Mr. Sandhir has not been the subject of any bankruptcy petition.

Eagle Investors LLC and its supervised person(s) are not compensated for advisory services with performance-based fees.

The firm, its principal and management persons have no relationship or arrangement with any issuer of securities of any kind.

Eagle Investors LLC and its management personnel have not been involved in any award or found liable in an arbitration claim alleging damages more than \$2,500 or found liable in any civil, self-regulatory organization, or administrative proceedings.

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**Item 20: Disaster Recovery Plan / Business Continuity Plan (DPP / BCP)**

Eagle Investors LLC is committed to safeguarding client interests and business continuity in the event of an emergency or significant business disruption. We maintain a comprehensive Disaster Recovery Plan (DRP) that serves as our Business Continuity Plan (BCP) and outlines procedures to address various disruptive scenarios, including:

Loss of key personnel: Death, incapacitation of investment advisor or representatives.

Technology outages: Power failures, cyberattacks, system failures, etc.

Protect client assets: We have secure offsite data storage and backup procedures to ensure the safety of client records and financial information.

Maintain essential operations: We have established alternate work communication channels to enable continued service to clients, regardless of the disruption's location.

Mitigate potential losses: We have identified critical business functions and established recovery procedures to minimize service interruption and financial impact.

Our DRP/BCP is regularly reviewed and updated to reflect changes in our business, personnel, and regulatory environment. We conduct periodic testing and drills to ensure the effectiveness of our plan and the preparedness of our staff.