

Eddy Company, LLC

27 County Way
Beverly, MA 01915
www.eddycompany.com

Form ADV Part 2A Brochure

January 1, 2025

Item 1: Cover Page

This brochure (“Brochure”) provides information about the qualifications and business practices of Eddy Company, LLC (“Eddy Company”), a registered investment adviser with the state of Massachusetts. Additional information about our firm and owner is available on the SEC’s website:
www.adviserinfo.sec.gov.

Registration does not imply a certain level of skill or training but only indicates that Eddy Company has registered its business with state authorities. 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. If you have any questions about the contents of this Brochure, please contact us at (978) 922-0435 or info@eddycompany.com.

Item 2: Material Changes

We will promptly update this Brochure when material changes occur. Material changes are summarized in this section.

We initially provide you with a copy of our Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we may choose to provide you with a complete copy of our Disclosure Brochure.

Since our last annual update dated March 31, 2023, we have made the following material changes:

- The description of services in Item 4 has been updated to reflect that we no longer offer financial planning. However, we have added tax preparation services.
- Item 5 has been updated to remove the description of financial planning fees, and add information on tax preparation services.
- Item 9 provides notice that you may obtain the disciplinary history of Eddy Company or our Investment Adviser Representatives from the Massachusetts Division of Securities upon request by contacting the Division at (617) 727-3548.
- Item 12 has been updated to more accurately describe our brokerage practices.
- We have updated Item 15 to provide additional information regarding our practices when deducting fees from your investment account.
- We have added Item 19 to provide required disclosures.

Note that we may have made other changes that are editorial in nature, to correct grammatical or typographical errors, to provide additional information or clarifications, or to correct formatting issues. We do not consider these changes to be material.

You may request a current copy of our Brochure at any time without charge by contacting us at

(978) 922-0435 or info@eddycompany.com.

You may also obtain a copy of our current Brochure from the SEC's website www.adviserinfo.sec.gov.

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Item 4: Advisory Business

Firm Overview

Eddy Company, LLC (“Eddy Company”) is an advisory firm that manages investment accounts of clients (“Clients”). The business was incepted in 2014. Brian T. Eddy, MBA, CFA®, CFP®, AEP® is the sole owner of Eddy Company.

Advisory Services

Eddy Company provides portfolio management services and tax preparation services. Each is described below:

Portfolio Management Services

Eddy Company provides non-discretionary portfolio management services, designed to meet each client’s stated investment objectives. These objectives are determined by data gathering, risk assessment questionnaires and interviews during the initial planning process.

Eddy Company gathers the following types of information when structuring a client portfolio:

- Your personal information, including income, net worth, tax status, employment status, family obligations, investment experience and invested assets.
- Your investment goals, financial objectives, risk tolerance, college funding needs, retirement planning needs, philanthropic activities, etc.
- Any investment restrictions or limitations that you may desire to place on the services that Eddy Company provides to you.

In most cases, an Investment Policy Statement is established that summarizes your specific financial circumstances, including goals and objectives, risk tolerance, and time horizon for investing. This information is used in the design, implementation and management of a diversified and risk appropriate investment portfolio. Thereafter, Eddy Company actively manages your portfolio on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and/or changes in your financial circumstances.

For our non-discretionary portfolio management clients, we have a limited power of attorney on your account which allows us to place the transactions at your Qualified Custodian. Upon review of your account, a notification of proposed trades will be sent to you via regular mail (or email, fax) with proposed securities transacted and amounts. We will only place the transactions for your accounts when we receive verbal or written permission to do so. Then, the firm will place the transaction at your Qualified Custodian at the buy or sell price as quoted on that day.

Tax Preparation Services

Eddy Company provides tax preparation services, which include preparation and filing of federal and state tax returns for individuals, couples, S-corporations, limited liability companies, partnerships, and non-profit organizations.

Wrap Fee Program

Eddy Company does not participate in a wrap fee program.

Assets Under Management

As of December 20, 2024, we had \$13,850,676 in assets under management on a non-discretionary basis. Eddy Company does not manage assets on a discretionary basis.

Item 5: Fees and Compensation

Portfolio Management Services

For portfolio management services, Eddy Company receives advisory fees based upon a percentage of assets under management, payable quarterly in arrears. Advisory fees are negotiable on a case by-case basis, and are specified in Advisory Services Agreement that we have with clients.

Eddy Company’s standard fee schedule is as follows:

Combined Account Value	Annual Fee
Up to \$250,000	1.75%
Over \$250,000 and under \$500,000	1.50%
Over \$500,000 and under \$1,000,000	1.25%
Over \$1,000,000 and under \$3,000,000	1.00%
Over \$3,000,000	0.75%

By signing Eddy Company’s Advisory Services Agreement, you provide written authorization to have the Qualified Custodian deduct its advisory fee directly from the account(s) that the firm manages. You may also elect to pay advisory fees by check. Advisory fees are due and payable on a quarterly basis in arrears.

Every calendar quarter, Eddy Company will mail you an invoice that includes the following information:

- Assets Under Management: month-end account value(s) for the three months in the quarter, and an average of these values.
- Method of Fee Calculation: the management fee is calculated by multiplying one quarter of your annual fee with the averaged month-end account value.

- Payment method: whether the fee will be directly deducted from the account(s) or paid by check per client instructions.

We encourage you to review your quarterly invoice closely, including the month-end account values and fee calculation. The Qualified Custodian will deduct a management fee but does not check account values or calculations.

Direct account deductions will be processed within two weeks after the invoice is mailed.

Advisory fees for accounts opened or closed during the calendar quarter will be prorated based on the number of days in the quarter that services were provided.

Tax Preparation Fees

Tax preparation fees are quoted per project, based on the complexity of the tax return. Fees are generally in line with industry averages, with an average tax preparation fee ranging from \$300 to \$600 per return.

Security Valuations

All of the securities we manage on your behalf are liquid and have pricing available by the securities exchanges. In most cases, we rely on the Qualified Custodian that holds your brokerage account to provide us with security valuations.

Termination

Please note, unless you have received our Disclosure Brochure at least 48 hours prior to signing an advisory agreement, you may terminate the advisory agreement within five (5) business days of signing the agreement without incurring any penalties and advisory fees.

Our Advisory Services Agreement may be terminated by either party with written notice delivered to the other. All transactions placed at your Custodian up to our receipt of the termination notice will be completed by your broker custodian; no other transactions will be placed by Eddy Company after receipt of the termination notice.

Tax preparation engagements automatically conclude upon acceptance of your tax return by the taxing authority.

Fee Refunds

Upon termination of portfolio management services, Eddy Company will charge a prorated fee for services provided during the final billing period prior to termination. Because portfolio management fees are charged in arrears, no refunds are given upon termination.

Tax preparation fees are due upon completion of the project; therefore, no refunds are given upon termination.

General Information about Eddy Company's Advisory Services and Fees

The official record-keeper of your account data and information is your Qualified Custodian.

Eddy Company's fees for portfolio management services do not include additional fees or expenses you pay as the owner of your assets. Eddy Company does not participate in these fees or expenses (directly or indirectly). These include (but are not limited to): brokerage commissions, transaction fees, expenses charged by exchange traded funds, custodial fees, transfer taxes, and wire transfer and electronic fund processing fees.

Item 6: Performance-Based Fees and Side-by-Side Management

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance-based fees). Our advisory fee compensation is charged only as disclosed above.

Item 7: Types of Clients

Eddy Company provides portfolio management services to individuals. We provide tax preparation services to individuals, couples, S-corporations, limited liability companies, partnerships, and non-profit organizations.

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

Eddy Company generally structures client portfolios using ETFs and fixed income investments (bonds, CDs and money market). The firm's investment strategy is to provide diversification amongst asset class, investment style, and market capitalization.

Macro Market Analysis

Eddy Company conducts an ongoing review of macro conditions, including (but not limited to) the following areas:

- Economic- interest rates, employment, taxation changes, economic growth.
- Political- how government policy impacts the economy and markets.
- Legal- the legal environment in which the markets operate.

Exchange Traded Fund (ETF) Analysis

Eddy Company conducts both qualitative and quantitative analysis of ETFs for inclusion in portfolios. The following factors are analyzed in order to properly screen ETFs:

- Expense Ratio- cost efficiency is a critical component of choosing an ETF that meets the intended objective.
- Index Methodology- determining whether an ETF is market capitalization weighted or equal-weighted.
- Depth of Holdings- the depth of exposure offered can have a significant impact of the ETF's risk/return profile.
- Tracking Error- tracking error is a good measure of the efficiency of the ETF manager. The smaller the difference between an ETF and its underlying index, the better.
- Tax Efficiency- ideally, ETFs will make zero short term capital gains distributions.

Long Term Investment Strategy

Depending on the needs of the client and consistent with the client's investment objectives and risk tolerance (among other considerations), Eddy Company typically purchases securities with the intention of holding them in the client's account for five years or longer. This strategy is a cornerstone of Eddy Company's approach: keeping a long-term perspective with good diversification.

Information the firm uses to provide advice includes:

- Financial journals
- Research materials prepared by third parties
- Shareholder reports
- Annual reports, and filings with the Securities and Exchange Commission
- Company press releases
- Qualified Custodian's investment research
- Websites
- Public investment advisory databases

Risk of Loss

Investments in securities always carry the potential for the risk of loss of your invested assets and/or any appreciation of your holdings that have not been realized. Losses in an investment portfolio are a potential event you should be prepared to bear.

We do not represent to you or any client, either directly or indirectly, any level of performance or any representation that our professional services will not result in a loss to your invested assets. We do our very best as an investment advisor to manage risk exposures and to prevent losses. However, losses cannot be prevented in all cases.

Item 9: Disciplinary Information

As of the date of this Brochure, we do not have any items to disclose to you for Eddy Company or our management person. You may obtain the disciplinary history of Eddy Company or our Investment Adviser Representatives from the Massachusetts Division of Securities upon request by contacting the Division at (617) 727-3548.

Item 10: Other Financial Industry Activities and Affiliations

Neither Eddy Company nor Brian Eddy is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. In addition, neither Eddy Company nor Brian Eddy is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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

Code of Ethics

We have adopted a formal Code of Ethics to govern our business practices. All employees of Eddy Company are required to acknowledge their responsibilities under the Code and to agree to adhere to all provisions. The Code includes policies regarding standards of professional conduct, conflicts of interest, insider trading, and personal security trading. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

To obtain a copy of Eddy Company's Code of Ethics, please contact Brian Eddy at (978) 922-0435 or brian@eddycompany.com.

Participation or Interest in Client Transactions

We do not manage any proprietary funds or private investments; therefore, we do not have any material financial interest in any investments that may be used in client portfolios. We do not engage in principal transactions or agency cross transactions.

Personal Trading

As a matter of policy, Eddy Company and its employees do not invest in the same securities as those recommended to clients.

Item 12: Brokerage Practices

Recommendation of a Broker/Custodian

We recommend Charles Schwab & Co., Inc. (“Schwab”), an unaffiliated registered broker-dealer, for brokerage and custodial services. We have established a relationship with Schwab that facilitates our non-discretionary management of your brokerage accounts.

Through our participation in Schwab’s advisory programs, we receive various benefits, provided without cost or at a discount, that may not be available to retail customers. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research related products and tools; pricing and market data; access to software, technology or services; attendance at educational conferences and events; consulting on technology, compliance or other business matters; access to industry publications. Some of these products and services may benefit you directly, while others may benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

The availability of these services does not depend on the number or value of brokerage transactions directed to the custodian. These services are available to all advisers who participate in the custodial programs, and are not provided in exchange for us directing client trades to the custodian. We do not direct client trades to a particular broker; all transactions are executed through the custodian that holds the client’s account. Therefore, the services and benefits that we may receive from a custodian are not considered soft dollar arrangements.

The receipt of these benefits from the custodians creates a potential conflict of interest as we may have an incentive to recommend you maintain your account with a specific custodian. However, although we may recommend you use Schwab as your Qualified Custodian, you have the discretion to decide whether to do so, and will open your account directly with Schwab by entering into an account agreement with Schwab.

Commissions

Eddy Company does not have the discretionary authority to negotiate commissions with the Qualified Custodian. Commissions you pay to the Qualified Custodian are disclosed on the confirmation of each security transaction we place on your behalf (if any) at the Qualified Custodian. These confirmations are sent directly to you by the Qualified Custodian.

Types of Brokerage Activity

Block Trading

We may, but are not obligated to aggregate the transactions of more than one client together with other clients in the same security. Due to the customized nature of our portfolio management services, we do not often block security transactions for more than one client together. We may execute block trades at other brokers or dealers on a Trade Away basis; however, it is not anticipated that this will occur frequently. Block trading may occur on a min-block basis across multiple accounts in the same security for your accounts held at the Qualified Custodian.

Block trading the same security for multiple accounts is one method we can use to meet our fiduciary obligation of best execution. When blocking transactions for multiple clients the size of the transaction is larger than placing all the transactions individually, which allows Eddy Company to negotiate the price of the security within the spreads available at that time (a spread is the quoted low and high side of the security; low price is what the broker is willing to pay for the security, the quoted high price is what we would typically be expected to pay for the security). We do not have the authority to negotiate commissions when executing transactions on an individual client basis.

Prohibited Brokerage Practices

Soft Dollars

Eddy Company does not participate in Soft Dollars transactions or services, where client commissions are utilized to generate commission credits available to Eddy Company to pay for research and execution services.

Brokerage for Client Referrals

Eddy Company does not direct or recommend brokers (or use brokers) in exchange for client referrals. We evaluate and use brokers as described above.

Trade Errors

Eddy Company has fiduciary responsibilities related to the correction of trade errors. If Eddy Company creates the error, our policy is to make the client whole, meaning that you will not suffer an economic loss due to the error. We have policies and procedures related to the identification, documentation and correction of errors. If a third party caused or created the error, the third party is responsible for the correction of the error and making your account(s) whole.

We endeavor to catch all errors before settlement; typically errors are corrected by a simple cancel of the error trade and re-entry of the trade as it should have been placed. Examples of trade errors include (but are not limited to) to the following:

- Are not legally authorized for an account
- Are prohibited by investment policy or style
- Are prohibited by the Advisory Services Agreement
- Include an incorrect security or transaction (buy vs. sell or vice versa)
- Block trades that are incorrectly allocated

If a trade error results in a gain in the impacted client account, the gain remains in the client account.

Item 13: Review of Accounts

With portfolio management services, accounts are reviewed at least quarterly by an Eddy Company advisor, to ensure the investment allocations are consistent with your documented goals and objectives. Additional reviews may be conducted if your goal and/or objectives change (we recommend that clients contact us as soon as possible whenever significant personal events take place). Portfolio reviews are scheduled on at least an annual basis, but may happen as frequently as quarterly depending on client preferences. Reviews may be conducted in person or via telephone.

Clients with assets held in custody at the Qualified Custodian receive a monthly custodial report directly from the Qualified Custodian. These reports include a summary of current holdings and asset values as well as a complete transaction history (deposits, withdrawals, income, management fee deductions, etc.).

Eddy Company provides yearly performance reports for all accounts under our management. Our quarterly report includes:

- A market commentary
- Current and historical portfolio values
- Rates of return
- Consolidated asset allocation summary
- Detailed holdings as of the report date by asset class

The official record keeper of your account(s) is your Qualified Custodian. In this official capacity, the Qualified Custodian reports certain types of distribution and gain/loss information to the Internal Revenue Service. If you have any questions on capital gains or losses or cost basis information on your security transactions, please contact us.

We do not provide recurring reviews for tax preparation clients. Clients must engage tax preparation services for each tax year.

Item 14: Client Referrals and Other Compensation

Eddy Company does not pay any person directly or indirectly for the introduction or acquisition of clients.

Item 15: Custody

Eddy Company does not have physical custody of client's funds or securities. All assets for your accounts are held by a qualified and independent custodian (bank, broker, trust company or insurance company). However, we may be deemed to have custody when we directly debit our advisory fees from your account. When our investment advisory fees are deducted from your account:

- We will obtain your written authorization to deduct our investment advisory fees from your account.
- Each time a fee is deducted, we will send the qualified custodian notice of the amount of the fee to be deducted from your account. At the same time, we will send a statement to you that itemizes the fee, including the formula used to calculate the fee, the amount of assets under management upon which the fee is based, and the time period covered by the fee.
- The qualified custodian that holds your account will send you statements, on at least a quarterly basis, showing all disbursements from the account, including the amount of advisory fees.

Item 16: Investment Discretion

Please see [Portfolio Management Services](#) in Item 4 above, where we discuss investment discretionary authority and your ability to place limits on that authority.

Item 17: Voting Client Securities

Eddy Company does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

Item 18: Financial Information

Eddy Company has never filed for bankruptcy and is not aware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

Item 19: Requirements for State-Registered Advisers

Brian Eddy is the sole owner of Eddy Company. His formal education and business background can be found on the accompanying Form ADV Part 2B Brochure Supplement.

Other than the advisory services described in this Brochure, our firm is not engaged in any other business activities, and does not have any relationship or arrangement with any issuer of securities.

Neither Eddy Company nor Brian Eddy is compensated for advisory services with performance-based fees. Furthermore, neither Eddy Company nor Brian Eddy has been involved in any award resulting from an arbitration claim, or civil, self-regulatory, or administrative proceeding.

Eddy Company, LLC

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Form ADV Part 2B Brochure Supplement

January 1, 2025

Item 1: Cover Page

This brochure supplement provides information about Brian T. Eddy, MBA, CFA®, CFP®, AEP®, Chief Executive Officer

You should have received a copy of Eddy Company's Part 2A brochure, as we include this supplement with all copies. Please contact Brian Eddy at (978) 922-0435 or brian@eddycompany.com if you did not receive Eddy Company's brochure or if you have any questions.

Additional information about these individuals is available on the SEC's website:
www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Brian T. Eddy, MBA, CFA®, CFP®, AEP®, Chief Executive Officer

Born 1977

Educational Background and Business Experience

Brian Eddy has provided fee-only advisory solutions for clients since 2001. His firm, Eddy Company, LLC, was established in 2014. He earned a BS degree from Gordon College in 1999. He spent several years in the investment management industry. From 2001 until 2006, Brian worked on a private asset management team for US Trust Company in Boston, MA. He earned his MBA from Boston University in 2007. Brian then managed private clients' portfolios for Cape Ann Savings Bank in Gloucester, MA from 2008 until 2014.

Professional Designations

Brian holds a Chartered Financial Analyst (CFA) designation, is a CERTIFIED FINANCIAL PLANNER® (CFP®) Professional, and holds the Accredited Estate Planner® (AEP®) designation. Additional information regarding these designations is provided below.

Certified Financial Analyst® (CFA®)

The Chartered Financial Analyst® (CFA®) designation is conferred by the CFA Institute. A financial analyst seeking membership to the CFA Institute must:

- meet eligibility requirements;
- fully comply with the CFA Code of Ethics and Standards of Professional Conduct;
- study books, journal articles, and other readings designated by the CFA Institute;
- successfully pass three examinations, each approximately six hours in length and administered by the CFA Institute.

The candidate for the CFA designation must have at least a single current and principal engagement:

- in financial analysis of securities investment for a bank, investment company, insurance company, or other financial services or investment management firm;
- as an assistant, associate, or full professor or dean of a college or university, who teaches and/or researches;
- as an economist involved in financial analysis of securities investment;
- as a portfolio manager;
- as a financial analyst of securities investment within a public agency;
- as a financial analyst of securities investment for a corporate pension, profit sharing, or other retirement fund; or

- as a manager of financial analysts or portfolio managers involved with securities investment and who, before assumption of management obligations, was a financial analyst or portfolio manager.

The CFA is awarded to candidates who have passed the examinations and met the other requirements specified by the CFA Institute.

CERTIFIED FINANCIAL PLANNER® (CFP®)

The CERTIFIED FINANCIAL PLANNER®, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years (at least 6,000 hours) of full-time financial planning-related experience or complete at least two years (at least 4,000 hours) of full-time financial planning-related experience while under the supervision of a CFP® Professional; and
- Ethics – Agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and Standards of Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Code of Ethics and Standards of Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Accredited Estate Planner® (AEP®)

Administered by the National Association of Estate Planners & Councils, the Accredited Estate Planner® designation is awarded only to estate planning professionals who meet special requirements of education, experience, knowledge, professional reputation, and character. Designees are required to complete educational requirements and to have an active practice for a minimum of five years in a discipline of accounting, insurance and financial planning, law, philanthropy or trust services. In addition, designees must devote at least one-third of their time to estate planning and must possess one or more specific professional designations. To maintain the designation, individuals must annually recertify their qualifications and complete a minimum of 30 hours of continuing education every two years.

Security Examinations

FINRA (previously NASD) Series 65 (2014).

Item 3: Disciplinary Information

We do not have any legal, financial or other disciplinary item to report for Brian Eddy.

Item 4: Other Business Activities

Brian Eddy does not have any other financial services business affiliations other than Eddy Company, LLC.

Item 5: Additional Compensation

Neither Eddy Company, LLC nor Brian Eddy receives additional compensation from third parties in connection with providing investment advice to clients.

Item 6: Supervision

As Chief Executive Officer, Brian Eddy has the ultimate responsibility for the supervision of firm activities as well as investment advice offered to clients. If you would like to contact Brian about his supervisory role, he can be reached at (978) 922-0435 or brian@eddycompany.com.

Brian is responsible for the implementation and administration of Eddy Company's Compliance Program under regulatory requirements. Supervision of the advisory activities of Eddy Company are governed by adherence to the firm's written policies and procedures.

Item 7: Requirements for State-Registered Advisers

Brian Eddy has never been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.