

Item 1: Cover Page



ENVEST
ASSET MANAGEMENT, LLC

Mailing Address
P.O. Box 701
Georgetown, CT 06829

Form ADV Part 2A – Firm Brochure

(516) 521-7898

Dated May 6, 2026

<https://envestam.com>

This Brochure provides information about the qualifications and business practices of Envest Asset Management, LLC, “EAM”. If you have any questions about the contents of this Brochure, please contact us at (516) 521-7898 or james.osborn@envestam.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Envest Asset Management, LLC is registered as an Investment Adviser with the States of California, Connecticut, New York, Vermont, and Commonwealth of Pennsylvania, and has Notice Filed in the State of Texas. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about EAM is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 293134.

Item 2: Material Changes

Since the annual filing of this Brochure on January 8, 2026, EAM has had the following material changes to report:

Item 4: Advisory Business – EAM has enhanced its tax strategy services having a designated Enrolled Agent on staff. However, EAM will not be acting as a tax preparer.

Item 3: Table of Contents

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	9
Item 6: Performance-Based Fees and Side-By-Side Management	12
Item 7: Types of Clients	12
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	12
Item 9: Disciplinary Information	17
Item 10: Other Financial Industry Activities and Affiliations	17
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	18
Item 12: Brokerage Practices	19
Item 13: Review of Accounts	20
Item 14: Client Referrals and Other Compensation	21
Item 15: Custody	22
Item 16: Investment Discretion	23
Item 17: Voting Client Securities	23
Item 18: Financial Information	23
Item 19: Requirements for State-Registered Advisers	24
Form ADV Part 2B – Brochure Supplement	26
Form ADV Part 2B – Brochure Supplement	29

Item 4: Advisory Business

Description of Advisory Firm

Envest Asset Management, LLC (“EAM”) is registered as an Investment Adviser with the States of California, Connecticut, New York, Vermont, and Commonwealth of Pennsylvania, and has Notice Filed in the State of Texas. We were founded in January 2018. James N Osborn Jr. is the principal owner of EAM and Karen Ogden is a partner at EAM. As of January 8, 2026, EAM reports \$44,196,540 discretionary, and \$1,611,624 non-discretionary Assets Under Management.

EAM will have a wholistic advisement philosophy that may include the use of socially, responsible, impact (“SRI”) and environmental, social, governance (“ESG”) investing. EAM was founded based on the belief that through SRI and ESG investing, investors can make a significant impact toward an ever-better environment while meeting investors’ financial objectives.

Types of Advisory Services

Investment Management Services

We are in the business of managing individually tailored investment portfolios on both a discretionary and non-discretionary basis.

In a discretionary account clients grant us discretionary authority to manage and trade in their accounts. Discretionary authorization will permit us to determine the specific securities and the number or value of securities, to be purchased or sold for clients’ accounts without obtaining their approval prior to each transaction. EAM will also have discretion over the broker or dealer to be used for securities transactions in their accounts. Discretionary authority is typically granted by the investment advisory agreement clients sign with our firm, a power of attorney, or trading authorization forms. Clients can limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for their account) by providing our firm with their restrictions and guidelines in writing.

If a client enters into non-discretionary arrangements with our firm, we will need to obtain the client’s approval prior to executing any transactions on behalf of their account. They have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client including, where specified, the client’s election toward social impacts. Through personal discussions in which goals and objectives based on a client’s particular circumstances are established, we develop a client’s personal investment policy or an investment plan with an asset allocation target and create and manage an appropriate portfolio based on that policy and allocation targets. We may also review and discuss a client’s prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., social impact, environmental impact, maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors, in both

discretionary and non-discretionary accounts. Fees pertaining to this service are outlined in Item 5 of this brochure.

Investment Advisory Services

Our investment advisory service may include use of third-party money managers (“Outside Managers” and “Sub-Advisers”) for portfolio management services, when appropriate. We assist clients in selecting an appropriate allocation model, completing the Outside Manager’s investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

Financial Planning

We provide financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is a comprehensive evaluation of a client’s current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

EAM will furnish a written statement prior to executing an agreement when a conflict exists between the interests of the investment adviser and the interests of the client. Furthermore, the client is under no obligation to act upon the investment adviser's recommendation, and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial

picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes reference to potential future estate taxes and suggestions relating to estate planning strategies.

We always recommend that you consult with a qualified attorney and/or tax professional when you initiate, update, or complete estate planning activities. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on potential distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

- **Tax Planning Strategies:** Discussion may include suggested ways to minimize current and future income taxes as a part of your overall financial planning picture. This may include using tax strategies associated with investment accounts and/or those associated with federal and state tax filings. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

While we have an Enrolled Agent on staff, we always recommend that you consult with a qualified tax professional before initiating any tax planning strategy. We will participate in meetings or phone calls between you and your tax professional with your approval.

- **Reducing Environmental Impact:** For clients with a strong interest in their personal environmental impact, we provide guidance around the types of subsidies available that may lessen the cost of environmentally friendly home improvements or vehicle purchases as well as other general suggestions if requested.

For accredited investors, EAM can offer private, SRI/ESG investment opportunities under separate limited liability companies via a discretionary platform or via social private equity funds and other alternative investments.

Comprehensive Financial Planning Only

By paying an upfront fee as described in Item 5, the client will receive services listed above that most appropriately pertain to their unique situation.

Pension Consulting Services

Our firm offers pension consulting services in the form of advisory and financial planning services to plan sponsors of 401(k) and 403(b) plans. We advise on selection of plan managers and third-party administrators and provide ongoing consulting to the company’s fiduciaries as well as periodic meetings to discuss the performance of the plan based on the plan sponsor’s needs. Additionally, we are available to assist employees in enrollment in the plan and answer questions related to the available investments.

Employee Benefit Plan Services

Our firm offers employee benefit plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company’s participant-directed retirement plan (including but not limited to 401(k) and 403(b)). As the needs of the plan sponsor dictate, areas of advising could include social impact, SRI/ESG, investment options, plan structure and participant education.

In providing employee benefit plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”).

Plan Participant/Employee Financial Wellness

We provide Employee Financial wellness to companies to whom the firm has either Pension Consulting or Employee Benefit Plan Services. Financial wellness services for plan participants are on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Employee Financial Wellness is a comprehensive evaluation of a client’s current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, appropriate questions, information and analysis will be considered as they affect client’s financial situation. Plan participants receive this service through an existing agreement between the firm and corporations who contract for either Pension Consulting Services or Employee Benefit Plan Services. Plan participants using this service will have access to electronic financial planning and reporting, providing the plan participant with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

Plan participants are under no obligation to act upon the investment adviser's recommendation, and if the Plan Participants elect to act on any of the recommendations, the Plan Participants are under no obligation to effect the transaction through the investment adviser.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon each client which includes understanding each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Educational Seminars and Speaking Engagements

We may provide seminars for groups seeking general advice on investments and other areas of personal finance. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual’s need, nor does EAM provide individualized investment advice to attendees during these seminars. Topics covered during educational seminars will be determined by the Client and EAM.

Item 5: Fees and Compensation

Please note, unless a client has received the firm’s disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below. Lower fees for comparable services may be available from other sources.

Investment Management Services with Comprehensive Financial Planning

Our standard advisory fee may combine both ongoing financial planning and ongoing investment advisory services. It is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$1 - \$1,000,000	1.15%
\$1,000,001 - \$2,500,000	0.95%
\$2,500,001 - \$5,000,000	0.85%
\$5,000,001 and Above	Negotiated

For accounts less than \$250,000, EAM may charge a combination of fixed fee and asset-based fee. This fixed fee will typically range from \$500 to \$2,500 depending on the nature of the client’s account unless waived.

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The advisory fee is a levelized fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the account value as of the last day of the previous quarter. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Advisory fees are directly debited from client accounts, or the client may choose to pay by check. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated by either party at any time without penalty upon written notice to the other party. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Investment Advisory Services (Outside Manager)

EAM may allocate (and/or recommend that the client allocate) a portion of a client’s investment assets among unaffiliated independent investment managers (an Outside Manager) in accordance with the client’s designated investment objective(s). In such situations, the Outside Manager(s) shall have day-to-day responsibility for the active discretionary management of the allocated assets. EAM shall continue to render investment advisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives.

The standard advisory fee is based on the market value of the account and is calculated as follows:

Account Value	Annual Advisory Fee
\$1 - \$1,000,000	1.15%
\$1,000,001 - \$2,500,000	0.95%
\$2,500,001 - \$5,000,000	0.85%
\$5,000,001 and Above	Negotiated

EAM’s annual fees are negotiable on a case-by-case basis and are pro-rated and paid in arrears on a quarterly basis. The fees listed above are EAM’s advisory fees which are levelized and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart. The **fees paid to the Outside Manager are separate and in addition** to the fees that you pay to EAM. The combination of fees for EAM and the third-party managers will not exceed the industry standard of excessive fees, which is 3% (with the exception of Clients in the state of Vermont, in which the combined fee will not exceed 2% annually). No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Clients whose accounts are managed by an Outside Manager may incur additional costs, which will be disclosed when the account is opened.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated by either party at any time without penalty upon written notice to the other party. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Financial Planning Hourly Fee

Financial Planning for clients with targeted questions may be provided on an hourly basis. The hourly rate is between \$150.00 per hour and \$250.00 per hour, depending on complexity. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check.

Comprehensive Financial Planning Only

Comprehensive Financial Planning without an investment management agreement is available for individuals and families. Fees are generally \$5,000 but can be more or less based on the complexity of the engagement. The fee is payable in two installments: 70% upon engagement and the remaining upon delivery of the plan. Due to the level of work conducted at the beginning of this service, a 12-month commitment is required; however, we will not bill an amount above \$500 or more than six months or more in advance. Once we have completed the initial financial plan, clients may engage EAM for annual updates to the plan. The fee for the update will be lower than the initial fee and will based on complexity of what has changed but will not be less than \$600. In all cases, access to our firm planning portal will be included for active clients. Once the service enters the 13th month, this service may be terminated immediately upon written notice. Upon termination of this service, the fee will be prorated and any unearned fee will be refunded to the client.

As described above, clients who engage EAM as an investment manager will receive comprehensive financial planning for reduced, or no, additional expense according to account balances.

Employee Benefit Plan Services & Pension Consulting Services

Account Value	EAM's Services Fee	Financial Wellness Adder	Total EAM Fee with Financial Wellness
\$0 - \$1,000,000	0.25%	0.20%	0.45%
\$1,000,001 - \$3,000,000	0.20%	0.15%	0.35%
\$3,000,001 - \$5,000,000	0.15%	0.10%	0.25%
\$5,000,001 and Above	0.10%	0.05%	0.15%

Clients will be billed on a quarterly basis in arrears. An account may be terminated by either party at any time without penalty upon written notice to the other party. Since fees are paid in arrears, upon termination, no refund will be due. Any prorated amount will be calculated and billed to the client for payment. This does not include fees to other parties, such as Recordkeepers, Custodians, or Third-Party-Administrators. Fees for this service are either paid directly by the plan sponsor or deducted directly from the plan assets by the Custodian on a quarterly basis, and EAM's fee is remitted directly to EAM. In the event of termination any prepaid, unearned fees will be refunded to the client.

EAM Services Only Example Calculation

- Example 1: \$1,000,000 Account Value x 0.25% Services Fee = \$2,500
- Example 2: \$2,000,000 Account Value x 0.20% Services Fee = \$4,000

EAM Services Plus Financial Wellness Adder Example Calculation

- Example 1: \$1,000,000 AUM x 0.25% Services Fee + \$1,000,000 x 0.20% (Financial Wellness Adder) = \$4,500
- Example 2: \$2,000,000 AUM x 0.20% Services Fee + \$2,000,000 x 0.15% (Financial Wellness Adder) = \$7,000

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and **in addition to our fee**, and we shall not receive any portion of these commissions, fees, and costs. Clients receiving Pension Consulting Services will also typically be charged an initial plan setup fee and annual administration fee by the plan's third-party platform provider recommended by EAM, Vestwell Holdings, inc. ("Vestwell"), unless otherwise waived by Vestwell. Vestwell is an independent and unaffiliated platform provider that delivers various administrative and advisory services to plans formed pursuant to the Employee Retirement Income Security Act of 1974 ("ERISA").

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Fees may be set by advisor or by the Client with input from advisor. Fees charged will be based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. Fees are due at the conclusion of the Seminar. Advisor offers its services in a virtual or in-person setting. Should the event require travel arrangements, both parties must agree to the terms of travel (i.e. cost, distance, hotel arrangements) at the start of the engagement.

Clients may cancel the event with 30 days' advance written notice. Should the Client cancel the event within 30 days of the event (with the exception of weather or similar unforeseen causes), the Client will be responsible for reimbursement of any non-refundable travel expenses already incurred and a prorated fee for any work conducted in preparation of the event, based on the percentage of work done and the flat fee agreed upon by both parties.

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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profit sharing plans, charitable organizations, and corporations or other businesses.

The Advisor's minimum account size is negotiable and at its discretion. EAM may take on smaller clients with assets under \$100,000 from time to time. However, concentration risk may become an issue due to account size. Accounts with lower balances may pay a higher percentage rate on their annual fees which may prohibit appropriate diversification of a client's portfolio.

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

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, or when we perform Investment Supervisory services for clients, our primary methods of investment analysis are fundamental analysis, and cyclical analysis. Our primary investment strategy is passive

investment management. For certain clients, we also incorporate Environmental, Social and Governance priorities (“ESG”) and/or socially responsible investing (“SRI”).

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company’s financial statements, details regarding the company’s product line, the experience, and expertise of the company’s management, and the outlook for the company’s industry. The resulting data is used to measure the true value of the company’s stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock’s value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

We refer limited clients to third-party investment advisers (“outside managers”). Our analysis of outside managers involve the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager’s underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager’s compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that He may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager’s portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager’s daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

ESG and SRI Strategies

For clients that seek a strategy specifically aligned with ESG or SRI, we build on our passive investment strategy described above to integrate mutual funds, ETFs, or other vehicles that based on our research has ESG and SRI principals. For ETF and index fund investments, we seek to understand:

- Sponsor quality and commitment to sustainability
- Construction methodology
- Criteria by which ESG factors are assessed (including which data providers are used to determine ESG-related security eligibility and how securities are ranked according to ESG characteristics)
- Tracking error relative to appropriate benchmarks
- Liquidity
- Expenses

Model Marketplace

EAM may participate in the Model Marketplace of Altruist LLC, an SEC registered investment adviser and affiliate of Altruist Financial LLC. Through the Model Marketplace, EAM has access to model portfolios including Altruist LLC-generated portfolios and Third-Party Portfolios, to assist it in managing or advising EAM client accounts. Altruist LLC's Model Marketplace fees - which range between 0.00% and 1.00% and are listed in the Model Marketplace Fee Schedule available at altruist.com/legal - are automatically passed through to and debited from clients' accounts, according to the instruction of EAM. Altruist LLC and its affiliates do not act as investment advisers or fiduciary to EAM's clients. EAM is responsible for suitability of all investment decisions and transactions for client accounts subscribed to model portfolios through the Model Marketplace.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by

losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

SRI and ESG: Investing by utilizing SRI and ESG policies may affect the profitability, value, and share price of a company. There are risks that an investment could underperform regardless of a company's mission. Furthermore, clients may make investment decisions based on their social or ethical beliefs which could affect investment performance. EAM uses third party research, databases, websites, and other publications to aid in determining SRI and ESG focused investments.

ESG factors are subject to the bias of the managers, who adapt them in relation to different asset classes, portfolio constructions and investment objectives. Due to the absence of well-defined standards and to the existence of different approaches towards sustainable practices, ESG data is intrinsically based on a qualitative and discretionary assessment, which may cause the data to be inaccurate. Elements of subjectivity are part of the collection and interpretation of ESG data, and this could contribute to making the comparison between ESG integrated strategies difficult. Clients should be aware of the fact that evaluation they may do on some types of ESG factors may be consistently different from the approach selected by a manager. Third-party providers of ESG data may apply different frameworks, who could lead to incomplete, inaccurate or unavailable data. ESG criteria integration may also carry the risk of missing market opportunities when making decisions towards assets exclusion due to non-financial reasons. This uncertainty about data gathering may adversely affect portfolios relying on such data for the investment decision process. Sustainable finance frameworks and the consequent approaches are in an evolving stage, changes in investment decision-making processes that integrate ESG factors could occur over time, from incorporation of new data or techniques or due to new regulatory developments. Taking ESG considerations into account when making investment decisions may cause the client's investment to underperform investment strategies that do not consider ESG factors.

A socially responsible investment strategy may underperform investment strategies that do not consider socially responsible investing factors. The account may forgo otherwise attractive investment opportunities or increase or decrease exposure to certain types of issuers or certain sectors due to the consideration of socially responsible investing factors.

Private Placements: Private offerings of securities can offer gains for your investment portfolio however, they are often illiquid, high risk and carry the chance of entire loss. A distribution can consist of the return of your capital, however, distribution payments are not guaranteed and other factors can impact the investment. They are not suitable for or in the best interest of all investors. Investors should be aware that the companies have limited operating histories and it is possible to lose the entire amount invested. It is also important to remember that past performance is not indicative of future results.

Cryptocurrencies: EAM does not recommend investments into cryptocurrencies as part of its investment strategy. However, a client may specifically request that we provide advice with respect to cryptocurrencies and associated investment products. Clients are made aware that investments into this asset class carry their own unique risks. Risks can include, but are not necessarily limited to, that they have no legal tender status in the U.S., are not backed or supported by any government or central bank, value is completely derived by market forces of supply and demand and are more volatile than traditional assets, and they are not covered by either FDIC or SIPC insurance. Investments into cryptocurrencies are highly speculative and Clients should fully understand the risks they are assuming by electing to invest in them, including the potential loss of their entire investment.

Item 9: Disciplinary Information

Criminal or Civil Actions

EAM and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

EAM and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

EAM and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of EAM or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No EAM employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No EAM employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

EAM does not have any related parties. As a result, we do not have a relationship with any related parties.

EAM only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, EAM recommends limited clients to Outside Managers to manage their accounts. If we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, EAM will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis in all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and the Investment & Wealth Institute (IWI) Code of Professional Responsibility and Guidance Document, Disciplinary Rules and Procedures, and Rules and Guidelines for Use of the Marks. EAM 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. James N Osborn Jr. does not hold the CFP® designation, but does hold the CPWA® designation. Karen Ogden does hold the CFP® designation.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 5 days prior to the same security for clients. Furthermore, we are not incentivized to choose one manager over another.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Invest Asset Management, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

- **Research and Other Soft-Dollar Benefits**
 - EAM does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Charles Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.
- **Brokerage for Client Referrals**
 - We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.
- **Clients Directing Which Broker/Dealer/Custodian to Use**
 - We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients’ money over using a lower-cost custodian.

The Custodian and Brokers We Use (Charles Schwab and Altruist)

EAM may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (“Schwab”), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients’ assets and to effect trades for their accounts. Although we recommend that clients establish accounts at Schwab, it is the client’s decision to custody assets with Schwab. EAM is independently owned and operated and unaffiliated with Schwab.

EAM may recommend investment advisory services through the custodial platform offered by Altruist Financial LLC (“Altruist”), and its current clearing firm, Apex Clearing Corporation (each unaffiliated SEC-registered broker dealers and FINRA/SIPC members). Custody, clearing and execution services are provided by Apex Clearing Corporation through April 20, 2023, following which date, these services will be provided by Altruist Financial LLC as a self-clearing broker-dealer. Although we recommend that clients establish accounts at Altruist, it is the client’s decision to custody assets with Altruist. EAM is independently owned and operated and unaffiliated with Altruist.

(Please see the disclosure under Item 14 below.)

Aggregating (Block) Trading for Multiple Client Accounts

Outside Managers used by EAM may block trade client accounts at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

EAM will work with clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services.

Client accounts with the Investment Management Service will be reviewed regularly and no less frequent than annually. The account is reviewed with regards to the client’s investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client’s needs.

Clients will receive trade confirmations from the broker dealer that holds their account for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements directly from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Item 14: Client Referrals and Other Compensation

We may receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. We may, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

As disclosed under Item 12, Schwab provides EAM with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as adviser's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit EAM but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to EAM. Schwab Institutional may also provide other benefits such as educational events or occasional business

entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

EAM's clients may establish brokerage accounts through Altruist. EAM maintains an institutional relationship with Altruist whereby Altruist provides certain benefits to EAM, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit EAM and our clients.

As part of its fiduciary duties to clients, EAM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of, Schwab, or Altruist for custody and brokerage services.

EAM has entered arrangements with one or more independent third-parties ("Promoters") that refer prospective advisory clients to EAM. Such Promoters are compensated directly by EAM, and the fees charged by EAM to prospective advisory clients are not increased as a result of such referral.

The compensation paid by EAM to a Promoter will be memorialized in a written agreement, and is generally in the form of (i) a percentage of the advisory fees earned by EAM from clients referred by the Promoter, (ii) flat per-referral fees, and/or (iii) a recurring flat fee that does not vary based on the number of prospective advisory clients referred. Prospective advisory clients referred to EAM by a Promoter will receive a separate disclosure that describes the arrangement between the EAM and the Promoter, including the specific referral fees to be paid. EAM is independent and unaffiliated with the Promoters from whom it receives prospective advisory client referrals.

As of the date of this brochure, EAM has entered a prospective advisory client referral arrangement with Green Portfolio Inc. (CRD #330597).

Item 15: Custody

EAM does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which EAM directly debits their advisory fee:

- EAM will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- The client will provide written authorization to EAM, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge the client to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to our clients.

Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients may contact us if they have any questions regarding their statements or reports.

Item 16: Investment Discretion

For those client accounts where we provide investment management services, we provide both discretionary and non-discretionary client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold.

For accounts that we manage on a discretionary basis the client grants us discretionary authority to manage and trade in their account. Discretionary authorization will permit us to determine the specific securities and the amount of securities, to be purchased or sold for the client's account without obtaining client's approval prior to each transaction. The discretionary relationship will be outlined in the advisory contract and signed by the client.

For accounts that we manage a non-discretionary basis, we will secure the client's authorization prior to making any changes in the client's account. Additionally, the non-discretionary relationship will be outlined in the advisory contract and signed by the client.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, clients will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, EAM will forward them directly to the client by mail, unless the client has authorized EAM to contact the client by electronic mail, in which case, EAM would forward to client any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

James N Osborn Jr.

Born: 1979

Educational Background

- 2007 – MBA, University of Rochester
- 2002 – BS in Engineering, Villanova University

Business Experience

- 01/2018 – Present, Envest Asset Management, LLC, Founder, Principal, and CCO
- 01/2010 – 01/2018, Energy Power Management I, LLC, Director
- 10/2009 – 01/2010, TD Securities, LLC, Associate
- 07/2008 – 10/2009, TD Bank NA, Associate
- 06/2007 – 07/2008, UBS Securities LLC, Associate
- 06/2004 – 12/2005, Hunt Engineers, Environmental Engineer
- 01/2003 – 06/2004, Cameron Engineering & Associates, Environmental Engineer

Professional Designations, Licensing & Exams

- **Series 65 - Uniform Investment Adviser Law Examination**
- **Certified Private Wealth Advisor® (CPWA®)** - The CPWA designation signifies that an individual has met initial and on-going experience, ethics, education, and examination requirements for the job of private wealth advisor, which is centered on management topics and strategies for high-net-worth clients. Prerequisites for the CPWA designation are: a Bachelor's degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC®, RMA®, CFA®, CFP®, ChFC® CPA; acceptable ethical background/compliance history as decided in an admissions peer review process governed by the Ethics Board and five years of professional client-centered experience in financial services or a related industry. CPWA designees must complete a six-month pre-class educational component and an executive education program through an IWI-approved registered education program. CPWA designees are required to adhere to IWI's Code of Professional Responsibility and Guidance Document, Disciplinary Rules and Procedures, and Rules and Guidelines for Use of the Marks. CPWA designees must report 40 hours of continuing education credits, including two ethics and one tax/regulations hours, every two years to maintain the certification. The designation is administered through Investments and Wealth Institute.

Other Business Activities

James N. Osborn Jr is not involved with other business activities that take 10% or more of his time or make up 10% or more of his income; judgements or liens; additional office locations; and any known or potential conflicts of interest.

Performance Based Fees

EAM is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Envest Asset Management, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Neither Envest Asset Management, LLC, nor James N Osborn Jr., have any relationship or arrangement with issuers of securities.

Additional Compensation

James N Osborn Jr. does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through EAM.

Supervision

James N Osborn Jr., as Founder, Principal, and Chief Compliance Officer of EAM, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

James N Osborn Jr. has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Item 1: Cover Page

Envest Asset Management, LLC

Mailing Address
P.O. Box 701
Georgetown, CT 06829
(516) 521-7898

Dated May 6, 2026

Form ADV Part 2B – Brochure Supplement

For

James N Osborn Jr. [Individual CRD# 5427507]

Founder, Principal, and Chief Compliance Officer

This brochure supplement provides information about James N Osborn Jr. that supplements the Envest Asset Management, LLC (“EAM”) brochure. A copy of that brochure precedes this supplement. Please contact James N Osborn Jr. if the EAM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about James N Osborn Jr. is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 5427507.

Item 2: Educational Background and Business Experience

James N Osborn Jr.

Born: 1979

Educational Background

- 2007 – MBA, University of Rochester
- 2002 – BS in Engineering, Villanova University

Business Experience

- 01/2018 – Present, Envest Asset Management, LLC, Founder, Principal, and CCO
- 01/2010 – 01/2018, Energy Power Management I, LLC, Director
- 10/2009 – 01/2010, TD Securities, LLC, Associate
- 07/2008 – 10/2009, TD Bank NA, Associate
- 06/2007 – 07/2008, UBS Securities LLC, Associate
- 06/2004 – 12/2005, Hunt Engineers, Environmental Engineer
- 01/2003 – 06/2004, Cameron Engineering & Associates, Environmental Engineer

Professional Designations, Licensing & Exams

- **Series 65 - Uniform Investment Adviser Law Examination**
- **Certified Private Wealth Advisor® (CPWA®)** - The CPWA designation signifies that an individual has met initial and on-going experience, ethics, education, and examination requirements for the job of private wealth advisor, which is centered on management topics and strategies for high-net-worth clients. Prerequisites for the CPWA designation are: a Bachelor's degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC®, RMA®, CFA®, CFP®, ChFC® CPA; acceptable ethical background/compliance history as decided in an admissions peer review process governed by the Ethics Board and five years of professional client-centered experience in financial services or a related industry. CPWA designees must complete a six-month pre-class educational component and an executive education program through an IWI-approved registered education program. CPWA designees are required to adhere to IWI's Code of Professional Responsibility and Guidance Document, Disciplinary Rules and Procedures, and Rules and Guidelines for Use of the Marks. CPWA designees must report 40 hours of continuing education credits, including two ethics and one tax/regulations hours, every two years to maintain the certification. The designation is administered through Investments and Wealth Institute.
- **Enrolled Agent (EA)** – An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee. Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must

adhere to ethical standards and complete 72 hours of continuing education courses every three years with a minimum of 16 hours earned per year, two of which must be on ethics. Enrolled agents must use an IRS-approved CE provider.

Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights, meaning they are unrestricted as to which taxpayers they can represent, what types of tax matters they can handle, and which IRS offices they can represent clients before.

Item 3: Disciplinary Information

No management person at Envest Asset Management, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

James N. Osborn Jr is not involved with other business activities that take 10% or more of his time or make up 10% or more of his income; judgements or liens; additional office locations; and any known or potential conflicts of interest.

Item 5: Additional Compensation

James N Osborn Jr. does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through EAM.

Item 6: Supervision

James N Osborn Jr., as Founder, Principal, and Chief Compliance Officer of EAM, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

James N Osborn Jr. has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Item 1: Cover Page

Envest Asset Management, LLC

Mailing Address

P.O. Box 701

Georgetown, CT 06829

(516) 521-7898

Dated May 6, 2026

Form ADV Part 2B – Brochure Supplement

For

Karen Ogden [Individual CRD# 4844105]

Partner

This brochure supplement provides information about Karen Ogden that supplements the Envest Asset Management, LLC (“EAM”) brochure. A copy of that brochure precedes this supplement. Please contact Karen Ogden if the EAM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Karen Ogden is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 4844105.

Item 2: Educational Background and Business Experience

Karen Ogden.

Born: 1964

Educational Background

- 1992 – MBA, University of Chicago Booth School of Business
- 1986 – BS in Finance, Boston College

Business Experience

- 11/2022 – Present, Envest Asset Management, LLC, Partner
- 10/2021 – 10/2022, Purkiss Capital Advisors, Inc., Senior Advisor
- 11/2016 – 09/2021, Guggenheim Securities, LLC
- 05/2016 – 10/2016, Unemployed
- 09/2015 – 05/2016, Woodcock Nature Center, Executive Director
- 10/2009 – 06/2015, Amherst Pierpoint, Chief Administrative Officer

Professional Designations, Licensing & Exams

- **Series 66 - Uniform Combined State Law Exam**
- **CERTIFIED FINANCIAL PLANNER™ (CFP®)** - CFP (Certified Financial Planner)®: CFP® certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. They must pass a comprehensive 2-day, 10-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

Item 3: Disciplinary Information

No management person at Envest Asset Management, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Karen Ogden is not involved with other business activities that take 10% or more of his time or make up 10% or more of his income; judgements or liens; additional office locations; and any known or potential conflicts of interest.

Item 5: Additional Compensation

Karen Ogden. does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through EAM.

Item 6: Supervision

Karen Ogden will be supervised by James N Osborn Jr. James N Osborn Jr. is the Founder, Principal, and Chief Compliance Officer of EAM, and is responsible for firm supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Karen Ogden has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.