

Wealth Engagement LLC  
CRD#310438  
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www.wealthengagement.com

January 15, 2021

**This brochure provides information about the qualifications and business practices of Wealth Engagement LLC. If you have any questions about the contents of this brochure, please contact us at 404-795-6124. 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. Registration as a registered investment advisor does not imply a certain level of skill or training.**

**Additional information about Wealth Engagement LLC also is available on the SEC's website at <http://www.adviserinfo.sec.gov>.**

## Item 2 Material Changes

On January 15, 2021, the Firm updated its address, phone number, and Chief Compliance Officer, as reflected in this document. Since the Firm's initial filing on September 1, 2020, The Firm's new address is 3715 Northside Parkway Building 100, Suite 500, Atlanta, GA 30327. The primary phone number is (404) 795-6124. The Firm's Chief Compliance Officer is Richard C. Lurie.

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## Item 4 Advisory Business

Wealth Engagement LLC is a newly registered investment advisor firm with registered with the Georgia securities regulators.

The principal owner of Wealth Engagement LLC is Tiffany S. Kent, Managing Partner.

### Advisory Services

Wealth Engagement LLC's ("WE LLC" or "Advisor") principal service is providing fee-based investment advisory services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the Client's objectives. The Advisor's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor may use exchange-listed securities, municipal securities, mutual funds, and ETFs to accomplish this objective. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure and/or overall career performance. On occasion, the Advisor may recommend redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, changes in risk tolerance of the Client, or any risk deemed unacceptable for the Client's risk tolerance.

WE LLC will tailor its advisory services to its Client's individual needs based on meetings and conversations with the Client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the Client to have a clear understanding of the Client's requirements.

WE LLC does not provide portfolio management services to wrap fee programs.

As of the approval date of the Firm, Tiffany had no clients and, therefore, no client assets under management.

## Item 5 Fees and Compensation

According to an investment advisory contract signed by each Client, the Client will pay WE LLC an annual management fee, payable quarterly in arrears, based on the value of portfolio assets of the account on the last business day of the preceding quarter. New account fees will be prorated from the inception of the account to the end of the first month.

The maximum management fee is 1.25%, which may be negotiated at the sole discretion of the Advisor. Asset management fees will be directly deducted from the client account on a quarterly basis by the qualified Custodian. The Client will give written authorization permitting the Advisor

to be paid directly from their account held by the Custodian. The Custodian will send a statement at least quarterly to the Client.

For each of the Advisor's services described above, the Client may terminate these services within five business days of the effective date of an Agreement signed with the Advisor without any Advisor's fee.

All fees paid to WE LLC for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee and other fund expenses.

At no time will WE LLC accept or maintain custody of a client's funds or securities except for authorized fee deduction. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The Advisors fee is separate and distinct from the custodian and execution fees.

Neither WE LLC nor its supervised persons 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.

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

WE LLC does not charge performance-based fees.

## Item 7 Types of Clients

The Advisor will offer its services to individuals, small businesses, and charitable organizations.

The Advisor's cumulative minimum account requirement for opening and maintaining an account is \$500,000. However, the Advisor may accept accounts with a lower value at its sole discretion.

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

The Advisor utilizes fundamental and cyclical analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price

evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions, and to calculate its credit risk.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class, or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns compared with the recent past.

The investment strategies the Advisor will implement may include long-term purchases of securities held at least for one-year, short-term purchases for securities sold within a year, and trading of securities sold within 30 days.

Investing in securities involves risk of loss that clients need to be prepared to bear.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisor's clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the Client's portfolio, risk tolerance, time horizon, and individual goals. However, the Client should be aware that with any trading that occurs in the client account, the Client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events, or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

The primary risks in technical analysis are that the factors used to analyze the price, trends, and volatility of a security may not be replicated, or the outcomes of such analysis will not be the same as in past periods where similar combinations existed. Because of the reliance on trends, technical analysis can signal buying at market peaks and selling at market troughs.

The Advisor does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities, causing the loss of some or all of the investment, including changes in interest

rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

## Item 9 Disciplinary Information

There are no legal or disciplinary events to report concerning either WE LLC or its management.

## Item 10 Other Financial Industry Activities and Affiliations

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

Neither WE LLC nor any of its management persons are registered or have 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.

WE LLC does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company, or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund" and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law Firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor or syndicator of limited partnerships.

WE LLC does not recommend or select other investment advisers for clients.

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

WE LLC is registering as a state registered investment advisor registered with the Georgia securities regulators and has adopted as an industry best practice a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of WE LLC deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of WE LLC are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. WE LLC collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. WE LLC will provide a copy of the Code of Ethics to any client or prospective Client upon request.

WE LLC and/or its investment advisory representatives may, from time to time purchase or sell products that they may recommend to clients. WE LLC and/or its investment advisory representatives have a fiduciary duty to put the interests of their clients ahead of their own.

WE LLC requires that its investment advisory representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

## Item 12 Brokerage Practices

WE LLC recommends clients open accounts through Folio Investments Inc., a Goldman Sachs company ("Folio" or the "Custodian"). The Custodian provides products and services that assist WE LLC in managing and administering clients' accounts, including software and other technology that (i) provides access to client account data (such as trade confirmations, account statements, and transaction based historical data); (ii) facilitates trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provides research, pricing, and other market data; (iv) facilitates payment of WE LLC fees from its clients' accounts; and (v) assists with back-office functions, recordkeeping, and client reporting.

WE LLC receives a benefit because we do not have to produce or pay for the research, products, or services. As a result of these services provided, commissions may be higher than those charged by other broker-dealers. Soft dollar benefits are used to service all client accounts; they are not used exclusively for the accounts that generated the soft dollar benefits. There is no effort to allocate soft dollar benefits to clients in proportion to the amount of soft dollar benefits generated by each Client.

When consistent with the duty to obtain best execution, multiple client transactions will be aggregated into a single order in order to obtain the best price for clients. In such circumstances, the accounts will receive securities at a total average price. WE LLC will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

## Item 13 Review of Accounts

Securities in client accounts are monitored on a regular and continuous basis by Tiffany S. Kent, Managing Partner of WE LLC. Formal reviews are generally conducted at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of triggering events, such as major changes in economic conditions or material market, economic or political events, changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify WE LLC if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan.

The Client will receive brokerage statements no less than quarterly from Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's account[s]. In addition, the Client will receive other supporting reports from mutual funds, trust companies or other custodians, broker-dealers, and others who are involved with client accounts. WE LLC does not deliver separate client statements.

## Item 14 Client Referrals and Other Compensation

As disclosed under Item 12 above, Advisor participates in Folio's institutional customer program, and Advisor may recommend Folio to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Folio retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. Folio may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by Folio through the program may benefit Advisor but may not benefit its client accounts. These products or services may assist Advisor in managing and administering client accounts, including accounts not maintained at Folio. Other services made available by Folio are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Folio. As part of its fiduciary duties to clients, Advisor 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 Folio for custody and brokerage services.

WE LLC does not directly or indirectly compensate any person who is not a supervised person for client referrals.

## Item 15 Custody

WE LLC does not have custody of client funds or securities, except for the withdrawal of advisory fees directly from client accounts. However, as noted in Item 13 above, clients will receive statements not less than quarterly from the qualified Custodian, and we encourage you to review

those statements carefully. Any discrepancies should be immediately brought to the Firm's attention.

## Item 16 Investment Discretion

WE LLC will have discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the Client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by WE LLC.

Discretionary authority will only be provided upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by WE LLC will be in accordance with each Client's investment objectives and goals.

## Item 17 Voting Client Securities

WE LLC will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The Client clearly keeps the authority and responsibility for the voting of these proxies. Also, WE LLC cannot give any advice or take any action with respect to the voting of these proxies. The Client and WE LLC agree to this by contract. Clients will receive proxy solicitations from their Custodian and/or transfer agent.

## Item 18 Financial Information

WE LLC does not require or solicit prepayment of more than \$500 in fees per Client, six months or more in advance, and is not required to file a balance sheet.

WE LLC has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If WE LLC does become aware of any such financial condition, this brochure will be updated, and clients will be notified.

WE LLC has never been subject to a bankruptcy petition.

## Item 19 Requirements for State-Registered Advisers

Tiffany S. Kent is Managing Partner and a Principal of WE LLC. Prior to forming Wealth Engagement LLC in 2020, Ms. Kent held positions of Vice President for AllianceBernstein (2018 – 2020), Vice President – Generalist for Friedberg Investment Management (2013 – 2016), an

Analyst – Power and Energy for Fortress Investment Group (2012 – 2013), Director / Portfolio Manager – Basic Materials at Plural Investments, LLC (2009 – 2011), Partner / Senior Analyst – Basic Materials at JL Advisors, LLC (2003 – 2008), Associate at Banc of America Merrill Lynch (2002 – 2003), Associate at Goldman Sachs (2001 – 2002), and Analyst at Credit Suisse Group (1997 – 1999).

Ms. Kent earned a Bachelor of Arts degree in Economics from the University of California, Berkeley, a Master in Business Administration degree from Harvard Business School, a Certificate of Completion from the Financial Planning Program at Emory University and became a CERTIFIED FINANCIAL PLANNER™ in 2020.

The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is issued by the Certified Financial Planner Board of Standards, Inc. Candidates are required to complete a CFP-board registered program. They must also pass the CFP Certification Examination. The exam includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's financial planning knowledge to real-world circumstances. Certified individuals are required to complete 30 hours of continuing education every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct. As a prerequisite to sitting for the CFP Certification Examination, candidates must hold a bachelor's degree (or higher) from an accredited college or university and have at least three years of full-time personal financial planning experience.

Richard C. Lurie is the Chief Compliance Officer for WE LLC. Before joining Wealth Engagement LLC in 2020, Mr. Lurie held the position of Relationship Manager with Forrester Research (1998 – 2014) and Marketing Management for IBM (1966-1997)

Mr. Lurie earned a Bachelor of Science degree in Mechanical Engineering from Purdue University and a Master of Business Administration in Finance/Marketing from Harvard University.

WE LLC is not engaged in any other business other than giving investment advice.

Management of WE LLC has not been found liable in any arbitration, civil or disciplinary actions, or administrative proceedings.

There are no material relationships maintained by WE LLC or its management persons with any issuers of securities.

**Item 1 Cover Page for Brochure Supplement**

Tiffany S. Kent, Managing Partner  
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January 15, 2021

**This brochure supplement provides information about Tiffany S. Kent that supplements the Wealth Engagement LLC brochure. You should have received a copy of that brochure. Please contact Tiffany S. Kent if you did not receive Wealth Engagement LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Tiffany S. Kent is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Educational Background and Business Experience**

Tiffany S. Kent is Managing Partner of WE LLC. Prior to forming Wealth Engagement LLC in 2020, Ms. Kent held positions of Vice President for AllianceBernstein (2018 – 2020), Vice President – Generalist for Friedberg Investment Management (2013 – 2016), an Analyst – Power and Energy for Fortress Investment Group (2012 – 2013), Director / Portfolio Manager – Basic Materials at Plural Investments, LLC (2009 – 2011), Partner / Senior Analyst – Basic Materials at JL Advisors, LLC (2003 – 2008), Associate at Banc of America Merrill Lynch (2002 – 2003), Associate at Goldman Sachs (2001 – 2002), and Analyst at Credit Suisse Group (1997 – 1999).

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## **Item 3 Disciplinary Information**

There are no legal or disciplinary events or proceedings to report concerning Ms. Kent.

## **Item 4 Other Business Activities**

Ms. Kent is not actively engaged in any investment-related or non-investment-related business or occupation outside of WE LLC.

## **Item 5 Additional Compensation**

Ms. Kent does not receive compensation or other economic benefits from anyone who is not a client for providing advisory services.

## **Item 6 Supervision**

Tiffany S. Kent is the Managing Partner of WE LLC and is the only individual who provides clients' investment advice. Ms. Kent is supervised by Tiffany S. Kent and can be reached at (404) 795-6124.

WE LLC provides investment advisory and supervisory services per the Firm's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Firm's Chief Compliance Officer, Richard C. Lurie, is primarily responsible for implementing the Firm's policies and procedures. Should a client have any questions regarding the Firm's compliance practices, please contact Richard C. Lurie at (203) 249-0532.

#### **Item 7 Requirements for State-Registered Advisers**

Ms. Kent has not been involved in an award or found liable in an arbitration claim, civil, or self-regulatory organization event or administrative proceeding, or been the subject of a bankruptcy petition.