



## **Resurgent Financial Advisors, LLC**

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This brochure provides information about the qualifications and business practices of Resurgent Financial Advisors LLC (hereinafter “Resurgent” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at (770) 615-8383. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Resurgent is a registered investment adviser. Registration does not imply any level of skill or training. The oral and written communications of an adviser provide you with the necessary information allowing you to determine whether to hire or retain an adviser.

Additional information about Resurgent (CRD No. 299575) is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s website also provides information about any persons affiliated with Resurgent who are registered, or are required to be registered, as investment adviser representatives of Resurgent.

## Item 2. Material Changes

Resurgent is required to discuss any material changes that have been made to the brochure since the Firm's last annual amendment dated March 31, 2022.

Since the filing of our last annual amendment, dated March 31, 2022, we have had the following material changes:

- Item 4. Advisory Services section was updated to reflect that we removed the reference to a registered representative of a broker dealer.
- Item 4 and Item 5. Wrap Fee Program section was removed as we no longer offer or participate in a wrap fee program.
- Item 5: The Investment Management Fees section was updated to reflect that Resurgent can bill clients on a monthly or quarterly basis. Clients can be charged up to 2.25% annually on the assets managed by Resurgent.
- Item 5: The Additional Fees and Expenses section was updated to include the following margin and fee information:
  - Our IAR's may trade on margin for client accounts, when consistent with the client's suitability profile and risk tolerance or at the client's directive. The use of margin results in interest charges as well as other fees and expenses associated with the security or account involved. Fees are debited directly from client accounts and are calculated using the total assets in the account as shown on the client custodial statement, including any assets purchased on margin. If there is a net debit cash balance in the account because of using margin, the cash balance will be excluded from the fee calculation. Net positive cash balances in type 1 (cash account) and type 2 (margin account) are included in the fee calculation.
- Item 5. Fees & Compensation – Under Section Additional Fees & Expenses, we added “It should be noted that the investment management fees charged by a Sub-Advisor are separate and in addition to the Annual Advisory fee charged by Resurgent.” to the 4th paragraph.
- Item 5. Compensation for the Sale of Securities or Other Investment Products section was updated to reflect that we removed the reference to a registered representative of a broker dealer.
- Item 8. Methods of Analysis section was updated as we added “Our Firm's investment advisors have access to various market, research, portfolio modeling and other tools and information to which he or she will use in determining investment advice provided to our clients.”
- Item 10. Other Financial Industry Activities and Affiliations section was updated as to reflect that we removed the reference to a registered representative of a broker dealer.
- Item 14. Client Referrals and Other Compensation section was updated and now reads:  
The Firm has entered into promoter agreements pursuant to which it compensates third-party

intermediaries for client referrals that result in the provision of investment advisory services by Resurgent. We will disclose these promoters to affected investors, and any cash solicitation agreements will comply with Rule 206(4)-3 under the Advisers Act. Promoters introducing clients to Resurgent may receive compensation from the Firm, such as a retainer, a flat fee per referral and/or a percentage of introduced capital. Such compensation will be paid pursuant to a written agreement with the promoter and generally may be terminated by either party from time to time. The cost of any such fees will be borne entirely by Resurgent and not by any affected client.

- Privacy Policy – The way we share your information has not changed, however, our policy has been updated with additional information for your reference.

Consistent with SEC rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year.

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## Item 4. Advisory Business

Resurgent Financial Advisors, LLC (“Resurgent”, “the Firm”, “we”, “our”, “us”) opened its doors in 2019. The Firm is primarily owned by Kip Caffey, CEO and Invergarry Holdings LP. In addition to Resurgent Financial Advisors, LLC, our Firm conducts some of its investment advisory business under different entity names which are listed in the Firm’s ADV Part 1 Section 1.B of Schedule D.

Resurgent offers a variety of advisory services, including financial planning, investment management, analysis, evaluation and monitoring. Resurgent works primarily with individuals and families. We believe that sound financial advice must be based on a thorough knowledge of client financial circumstances, risk tolerances and financial and personal goals. Our advisors begin client relationships by getting to know those considerations. Resurgent seeks to provide ongoing financial planning and investment strategies consistent with the goals and values defined by our clients. Prior to Resurgent rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with Resurgent setting forth the relevant terms and conditions of the advisory relationship (the “Investment Advisory Agreement”).

Resurgent Financial Advisors LLC has regulatory assets under management of \$348,088,434.71 managed on a discretionary basis and \$52,051,933.96 on a non-discretionary basis as of December 31, 2022.

While this brochure generally describes the business of Resurgent, certain sections also discuss the activities of its Access Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on Resurgent’s behalf and are subject to the Firm’s supervision or control.

### Advisory Services

Resurgent offers clients a broad range of investment management services, which may include any or all of the following functions: retirement income planning, education funding analysis, charitable giving analysis, intergenerational wealth transfer, tax optimization for investment assets and cash flow planning.

Resurgent offers these investment management services on both a discretionary and non-discretionary basis. Resurgent primarily allocates client assets among various mutual funds, exchange-traded funds (“ETFs”) and independent investment managers (“Sub-Advisors”), as well as a limited amount of individual debt and equity securities, and real estate investment trusts (“REITs”), in accordance with a client’s stated investment objectives. In addition, where appropriate, Resurgent also recommends that certain eligible clients invest in alternative investments and/or privately placed securities, which may include debt, equity and/or interests in pooled investment vehicles (e.g., private equity funds).

Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios.

Resurgent may advise clients on certain investment products that are not maintained at their primary

Custodian. Examples of these include life insurance, annuity contracts, and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Resurgent directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the Custodian designated by the product's provider. Resurgent may receive compensation for such recommendations in certain circumstances.

Resurgent tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Resurgent consults with clients on an initial and ongoing basis to assess their specific risk of not achieving stated financial goals and objectives, as well as a client's time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify Resurgent if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if Resurgent determines, in its sole discretion, the conditions will not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

In performing these services, Resurgent is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. Resurgent may recommend clients engage the Firm for additional related services, that its investment advisors in their individual capacities as insurance agents and/or other professionals to implement their recommendations. Clients are advised that a conflict of interest exists if they engage Resurgent's investment advisors if additional services outside the Firm are provided for compensation. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Resurgent under a financial planning or consulting engagement.

Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Resurgent's portfolio management and/or services.

### **Use of Sub-Advisors**

As mentioned above, where appropriate, Resurgent selects certain Sub-Advisors to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager are set forth in a separate written agreement with the designated Independent Manager or within the Investment Advisory Agreement ("IAA") executed with Resurgent. In addition to this brochure, clients will also receive the written disclosure documents of the respective Sub-Advisors engaged to manage their assets.

Resurgent evaluates a variety of information about Sub-Advisors, which may include the Sub-Advisors' public disclosure documents, materials supplied by the Sub-Advisors themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Sub-Advisors' investment strategies, past performance, and risk results in relation to its clients' individual portfolio allocations and risk exposure. Resurgent also takes into consideration each Independent Manager's

management style, returns, reputation, financial strength, reporting, pricing, and research capabilities, among other factors.

Resurgent continues to provide services relative to the discretionary or non-discretionary selection of the Sub-Advisors. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Sub-Advisors. Resurgent seeks to ensure the Sub-Advisors' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

In cases where a Sub-adviser is engaged in a client relationship, the client will also sign an advisory contract directly with the Sub-Adviser (Dual Contract Relationships) or through Resurgent combined with the Sub-Adviser (Single Contract Relationships). The Sub-Adviser will deliver their Firm Brochure, such as this one, to the client as well.

### **Fiduciary Responsibility for Retirement Accounts**

When we provide investment advice to a client regarding a retirement plan account or individual retirement account, Resurgent is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (ERISA) and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in the best interest of the client and not put Resurgent's interest ahead of the client's interest.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of the client's financial interests when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interests, fees and investments;
- Follow policies and procedures designed to ensure that gives advice that is in the best interest of the client;
- Charge no more than is reasonable for services provided; and
- Give the client basic information about conflicts of interest.

## **Item 5. Fees and Compensation**

Resurgent offers services on a fee basis, which include fees based upon assets under management or advisement. Fees are charged based on a tiered level, as well as fixed rates and/or fixed or hourly fees depending on the client relationship. Fixed or hourly fees may be charged if one of our investment advisors offers financial planning services. Please refer to your investment advisor's brochure supplement for more information on this.

### **Investment Management Fees**

Advisory fees are based upon the assets under management or advisement and can be charged on a

tiered level or at a fixed rate. Fees are generally negotiable, and the final fee schedule is contained in the IAA. Resurgent bills clients on a monthly or quarterly basis in advance or in arrears, based on asset values as of the last day of the previous quarter. For example, billing amounts for the first calendar quarter are based on account values as of 12/31. Clients can be charged up to 2.25% annually on the assets managed by Resurgent.

Fees for new accounts will be pro-rated to cover the period from the date an Account is opened through the end of the current calendar quarter. Clients may terminate the agreement without penalty for a full refund of the Firm's fees within five business days of signing the IAA. Thereafter, clients may terminate the Advisory Agreement generally with 30 days' notice. The full terms and conditions of the advisory engagement are set forth in the IAA.

### **Fee Discretion**

Resurgent may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities. The actual fees to the client will be disclosed in the IAA's.

### **Additional Fees and Expenses**

In addition to the advisory fees paid to Resurgent, clients also incur certain charges imposed by other third parties, such as Custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include transaction costs, reporting charges, custodial fees, fees and expenses related to alternative investments, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (*e.g.*, fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on securities transactions.

### **Margin Fees**

Our IAR's may trade on margin for client accounts, when consistent with the client's suitability profile and risk tolerance or at the client's directive. The use of margin results in interest charges as well as other fees and expenses associated with the security or account involved. Fees are debited directly from client accounts and are calculated using the total assets in the account as shown on the client custodial statement, including any assets purchased on margin. If there is a net debit cash balance in the account because of using margin, the cash balance will be excluded from the fee calculation. Net positive cash balances in type 1 (cash account) and type 2 (margin account) are included in the fee calculation.

### **Sub-Advisor Fees**

In relationships with Custodians and Sub-Advisors, all costs associated with the relationship will be disclosed in the contract signed by the client with the Custodian and/or Independent Manager. In some cases, Resurgent will receive a portion of the total fee charged by the Independent Manager and in other cases Resurgent will charge the total fee and pay a portion to the Independent Manager. It should be



noted that the investment management fees charged by a Sub-Advisor are separate and in addition to the Annual Advisory fee charged by Resurgent.

The client should review all fees charged by funds, brokers, Resurgent and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

### **Direct Fee Debit**

Clients generally provide Resurgent and/or certain Sub-Advisors with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified Custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Resurgent. Alternatively, clients may elect to have Resurgent send a separate invoice for direct payment.

### **Account Additions and Withdrawals**

Clients may make additions to and withdrawals from their account at any time. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients may withdraw account assets on notice to Resurgent, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client's investment objectives. Resurgent consults with its clients about the options and implications of transferring securities as necessary. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

### **Other Investment Products**

Some investment advisors of the Firm may accept compensation for the sale of other investment products, such as annuities and certain insurance products. Clients have the option to purchase such products through unaffiliated agents and are in no way required to purchase these products through Resurgent or one of its investment advisors.

### **Compensation for the Sale of Securities or Other Investment Products**

Certain persons providing investment advice on behalf of the Firm are licensed as independent insurance agents. These persons will earn customary commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our Firm who are insurance agents could have an incentive to recommend insurance products to you for the purpose of generating commissions. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Firm.

To fully understand both of these potential conflicts, you should review the additional information provided by your Advisor (the “Advisor Brochure”) which will advise if your Advisor serves in either of these roles. You are also encouraged to ask your Advisor about these potential licenses and registrations and potential conflicts.

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

Resurgent does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client’s assets).

## **Item 7. Types of Clients**

Resurgent provides services to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations, and business entities.

### **Minimum Account Requirements**

Resurgent does not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship. Certain Sub-Advisors may, however, impose more restrictive account requirements and billing practices from the Firm. In these instances, Resurgent may alter its corresponding account requirements and/or billing practices to accommodate those of the Sub-Advisors.

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

### **Methods of Analysis**

Resurgent’s primary method of analysis is fundamental. Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For Resurgent, this process typically involves an analysis of an issuer’s management team, investment strategies, style drift, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the Firm’s model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security. Our Firm’s investment advisors have access to various market, research, portfolio modeling and other tools and information to which he or she will use in determining investment advice provided to our clients.

### **Investment Strategies**

Resurgent manages client assets primarily on a discretionary but also on a non-discretionary basis. The Firm primarily invests client assets among various mutual funds and ETFs in accordance with the client’s stated investment objectives. Resurgent may also allocate client assets through Sub-Advisors

and individual debt and equity securities.

Resurgent tailors its advisory services to the individual needs of clients. The Firm consults with clients initially and on an ongoing basis to develop an investment policy statement and/or investment objectives and risk tolerance which determine the risk of not achieving stated financial goals and objectives and the client's time horizon among other factors that may impact the clients' investment needs. Resurgent seeks to ensure that clients' investments are suitable for their investment needs, goals and objectives and seeks to mitigate the risk of not achieving stated financial goals and objectives.

## **Risk of Loss**

### *Market Risks*

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Resurgent's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that Resurgent will be able to predict those price movements accurately or capitalize on any such assumptions.

### *Volatility Risks*

The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

### *Cash Management Risks*

The Firm may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

### *Equity-Related Security Risk*

The Firm may take long and short positions on behalf of clients in common stocks of U.S. and non-U.S. issuers traded on national securities exchanges and over-the-counter markets. The value of equity securities varies as investors continuously evaluate risks and returns. Equity securities are subject to three fundamental risk categories: company risk, industry risk and market risk. Company risk relates to the specific performance of a given company as compared with consensus expectations. Industry risks are those that relate to all companies in an industry, such as regulatory changes or shifting consumer tastes. All equity securities are subject to market risk, as overall stock prices rise and fall with investor estimates of economic expectations. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

*Fixed Income Security Risk*

Fixed income securities are subject to interest rate risk as rates move up or down, and to credit risk, which is the ability of the issuer or a guarantor to meet principal and interest payments on its obligations.

*Mutual Funds and ETF Risk*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains when they sell securities for a profit that cannot be offset by a corresponding loss.

*Risk from use of Sub-Advisors*

As stated above Resurgent may select certain Sub-Advisors to manage a portion of its clients' assets. In these situations, Resurgent continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Sub-Advisors' ability to successfully implement their investment strategies. In addition, Resurgent does not have the ability to supervise the Sub-Advisors on a day-to-day basis.

*Risk from use of Private Collective Investment Vehicles*

Resurgent advisors may recommend that certain clients invest in privately placed collective investment vehicles (e.g., hedge funds, private equity funds, etc.). The managers of these vehicles have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and there may be no requirement to diversify. Hedge funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities, including possible restrictions on investor liquidity. Clients should consult each fund's private placement memorandum and/or other documents explaining such risks prior to investing.

*Real Estate Investment Trusts (REITs) Risk*

Resurgent recommends an investment in, or allocates assets among, various real estate investment trusts ("REITs"), the shares of which exist in the form of either publicly traded or privately placed securities. REITs are collective investment vehicles with portfolios comprised primarily of real estate and mortgage related holdings. Many REITs hold heavy concentrations of investments tied to commercial and/or residential developments, which inherently subject REIT investors to the risks associated with a downturn in the real estate market. Investments linked to certain regions that experience greater volatility in the local real estate market may give rise to large fluctuations in the value of the vehicle's shares. Mortgage related holdings may give rise to additional concerns pertaining to interest rates, inflation, liquidity, and counterparty risk.

**Item 9. Disciplinary Information**

Resurgent has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

**Item 10. Other Financial Industry Activities and Affiliations****Licensed Insurance Agents**

One or more of the Firm's investment advisors are licensed insurance agents and may offer certain insurance products on a fully disclosed commissionable basis. A conflict of interest exists to the extent that Resurgent investment advisors recommend the purchase of insurance products where they may be entitled to insurance commissions or other additional compensation. The Firm has procedures in place to verify that recommendations are made in its clients' best interest regardless of any such affiliations.

You should refer to your individual advisor's brochure supplement for information about whether he or she is licensed to sell insurance products.

**Fees from Sub-Advisors**

As discussed above, Resurgent recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain Sub-Advisors. In certain circumstances the Firm's compensation is included in the advisory fee charged by such Sub-Advisors. There may be a conflict of interest to choose such Sub-Advisors; however, Resurgent evaluates Sub-Advisors objectively and not based on the amount of compensation it may receive from a particular Independent Manager.

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

Resurgent has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Access Persons. Resurgent's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Access Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no personnel with access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- The client's transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or

- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by open-end mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more open-end mutual funds.

Clients and prospective clients may contact Resurgent to request a copy of its Code of Ethics.

## Item 12. Brokerage Practices

### Recommendation of Broker/Dealers for Client Transactions

Resurgent generally recommends that clients utilize the custody, brokerage and clearing services of TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), Raymond James & Associates, Inc. member New York Stock Exchange and SIPC ("Raymond James") or Charles Schwab & Co., Inc. ("Charles Schwab") for investment management accounts. In many cases, however, clients are able to choose another Custodian with whom they wish to work.

Factors which Resurgent considers in recommending broker-dealers to clients include their respective financial strength, reputation, execution, pricing, research and service. To the extent that our Custodians charge commissions, the commissions paid by Resurgent's clients to any of our Custodians comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institutions might charge to affect the same transaction where Resurgent determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. Resurgent seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions are directed to certain broker/dealers (the Custodian chosen by the client unless we are directed otherwise as described below) in return for investment research products and/or services which assist Resurgent in its investment decision-making process. Such research generally will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Resurgent does not have to produce or pay for the products or services.

Resurgent periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

**Software and Support Provided by Financial Institutions**

Resurgent receives, without cost, from its Custodians, computer software and related systems support, which allow Resurgent to better monitor client accounts maintained through the Custodian. Resurgent receives the software and related support without cost because the Firm renders investment management services to clients that maintain assets at each Custodian. The software and related systems support may benefit Resurgent, but not its clients directly. All of the items received from our Custodians fall within the Securities Exchange Commission Safe Harbor with regard to soft dollars. In fulfilling its duties to its clients, Resurgent endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Resurgent's receipt of economic benefits from a broker/dealer creates a conflict of interest since these benefits provide an incentive for Resurgent to choose one broker/dealer over another that does not furnish similar software, systems support or services.

Specifically, Resurgent may receive the following benefits from a Custodian:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

**Brokerage for Client Referrals**

Resurgent does not consider, in selecting or recommending broker/dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

**Directed Brokerage**

The client may direct Resurgent in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Resurgent (as described above). As a result, the client may pay higher transaction costs (e.g., brokerage commissions and spreads) or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Resurgent may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers (as further discussed below).

**Trade Aggregation**

Transactions for each client generally will be executed independently unless Resurgent decides to purchase or sell the same securities for several clients at approximately the same time. Resurgent may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more



favorable commission rates or to allocate equitably among the Firm's client's differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among Resurgent's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which Resurgent's Access Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Resurgent does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares will be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when such account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares will be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations will be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions will be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares will be allocated to one or more accounts on a random basis.

## **Item 13. Review of Accounts**

### **Account Reviews**

Resurgent monitors client portfolios on a continuous and ongoing basis while regular account reviews are conducted on at least an annual basis. Such reviews are conducted by the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Resurgent and to keep the Firm informed of any changes thereto.

### **Account Statements and Reports**

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time to time or as otherwise requested, clients may also receive written or electronic reports from Resurgent and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should only rely on the account statements they receive from their Custodian and compare written or electronic reports they receive from Resurgent or an outside service provider.



## Item 14. Client Referrals and Other Compensation

### Client Referrals

The Firm has entered into promoter agreements pursuant to which it compensates third-party intermediaries for client referrals that result in the provision of investment advisory services by Resurgent. We will disclose these promoters to affected investors, and any cash solicitation agreements will comply with Rule 206(4)-3 under the Advisers Act. Promoters introducing clients to Resurgent may receive compensation from the Firm, such as a retainer, a flat fee per referral and/or a percentage of introduced capital. Such compensation will be paid pursuant to a written agreement with the promoter and generally may be terminated by either party from time to time. The cost of any such fees will be borne entirely by Resurgent and not by any affected client.

## Item 15. Custody

The IAA and/or the separate agreement with any Financial Institution generally authorizes Resurgent and/or the Sub-Advisors to debit client accounts for payment of the Firm's fees and to directly remit those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified Custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Resurgent.

In addition, as discussed in Item 13, Resurgent may also send periodic supplemental reports to clients. Clients should carefully review and rely only on the statements sent directly by the Financial Institutions and compare them to those received from Resurgent.

## Item 16. Investment Discretion

In many circumstances, Resurgent is given the authority to exercise discretion on behalf of clients. Resurgent is considered to exercise investment discretion over a clients account if it can effect and/or direct transactions in client accounts without first seeking their consent. Resurgent is given this authority through a limited power-of-attorney included in the agreement between Resurgent and the client. Clients may request additional limitations on this authority (such as certain securities not to be bought or sold). Resurgent takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made;
- The Broker-Dealer through which the transaction will execute\* and
- Whether Sub-Advisors are to be considered.

\*Consistent with the Firm's best execution obligation.

**Item 17. Voting Client Securities****Declination of Proxy Voting Authority**

Resurgent generally does not accept the authority to vote a client's securities (i.e., proxies) on their behalf.

Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitation.

**Item 18. Financial Information**

Resurgent is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its liability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years

PRIVACY POLICY

FACTS	WHAT DOES RESURGENT FINANCIAL ADVISORS DO WITH YOUR PERSONAL INFORMATION?		
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
What?	The types of personal information we collect, and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"><li>■ Social Security number and net worth</li><li>■ Account balances and transaction information</li></ul>		
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Resurgent Financial Advisors chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does Resurgent Financial Advisors share?	Can you limit this sharing?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		YES	NO
For our marketing purposes—to offer our products and services to you		YES	NO
For joint marketing with other financial companies		NO	N/A
For our affiliates' everyday business purposes—information about your transactions and experiences		YES	NO
For our affiliates' everyday business purposes—information about your creditworthiness		NO	NO
For our affiliates to market to you		NO	N/A
For nonaffiliates to market to you		NO	NO
To limit our sharing	<ul style="list-style-type: none"><li>■ Call 662-470-1970</li><li>■ Visit us online: <a href="http://resurgentadvisors.com">resurgentadvisors.com</a></li><li>■ Mail the <b>form</b> below</li></ul> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>		
Questions?	Call 662-470-1970 or go to <a href="http://resurgentadvisors.com">resurgentadvisors.com</a>		



Mail-in Form			
<b>Leave Blank OR</b> If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.  <input type="checkbox"/> Apply my choices only to me	Mark any/all you want to limit:		
	<input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.		
	<input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.		
	<input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.		
	Name		<b>Mail to:</b> Resurgent Financial Advisors 4128 Innslake Dr Glen Allen, VA 23060
Address			
City, State, Zip			
Account #			

**Who we are****Who is providing this notice?**

Resurgent Financial Advisors, LLC

**What we do****How does Resurgent Financial Advisors protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We make every effort to protect your information through our Cybersecurity policies and program.

**How does Resurgent Financial Advisors collect my personal information?**

We collect your personal information, for example, when you

- open an account
- apply for a loan
- use your credit or debit card

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies as permitted by law and required by in our day-to-day business.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

**What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on your account—unless you tell us otherwise.

**Definitions****Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *At this time Resurgent Financial has no affiliates.*

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Schwab Institutional, TD Ameritrade and/or Raymond James who serves as Custodian of client assets.*

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *At this time Resurgent Financial Advisors has no joint marketing agreements.*

**Other important information**

You may have other privacy protections under applicable state laws. To the extent the state laws apply, we will comply with them when we share information about you, and in some cases may be limited by you.

If you have questions about these policies, please contact our Chief Compliance Officer at 662-470-1970.