AUGĒO WEALTH MANAGEMENT, LLC

Form ADV Part 2A — Firm Brochure

Amended & Restated — October 2026

Walter Garbacik, Principal & Chief Compliance Officer

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Firm IARD No. 341437 | IAR CRD No. 2454174

This brochure provides information about the qualifications and business practices of Augēo Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (781) 801-0575 or walter@augeowealth.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.

Additional information about Augēo Wealth Management, LLC is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. A current copy of this brochure is available at no charge upon request. Clients may also obtain the disciplinary history of the firm or its representatives from the Massachusetts Securities Division upon request by contacting the Division at (617) 727-3548 or www.sec.state.ma.us.

Item 2 — Material Changes

This amended and restated Form ADV Part 2A (Firm Brochure) reflects amendments filed in July 2026 in response to a deficiency letter from the Massachusetts Securities Division dated May 7, 2026 (IARD No. 341437). The following material changes have been made from the previously filed version:

- Insurance Activity Removed: Walter Garbacik's Massachusetts insurance license is being allowed to expire. Augēo Wealth Management no longer engages in any insurance sales, brokerage, or consulting activity. All references suggesting that the Firm offers insurance sales, brokerage, consulting, commission-based insurance services, or insurance-product advice have been removed from this brochure and from Form ADV Part 1A. The brochure retains appropriate disclosures concerning insurance-needs analysis performed as part of financial planning and uncompensated referrals to independent licensed insurance professionals. The firm operates on a strictly fee-only basis with no commission-based compensation of any kind.
- Financial Planning Fee Structure Clarified: Standalone fixed and hourly fee ranges for financial planning engagements have been added to Item 5 and aligned with the Firm's stand-alone Table of Fees for Services.
- Alternative Investments: Item 8 has been expanded to describe all alternative investment and real asset exposures that may be utilized in client portfolios, along with detailed risk disclosures.
- Disciplinary History Statement Added: Per 950 CMR 12.205(8)(a)4, a statement has been added informing clients they may obtain the disciplinary history of the firm or its representatives from the Massachusetts Securities Division.
- Privacy Policy and NPI Opt-In Disclosures: Item 10 and a new Privacy Policy section address Massachusetts opt-in requirements for sharing non-public personal information with non-affiliated third parties.
- Custody Language Corrected: The word 'limited' has been removed from Item 15 per the Division's instruction.
- Business Continuity Plan: Item 16 has been updated to describe the firm's business continuity plan.
- Clients Over Age 65: Item 19 now includes policies and procedures for serving clients over age 65 and addressing potential diminished capacity.
- Cybersecurity Policies: Physical security and cybersecurity policies have been added.
- Table of Contents Page Numbers: The Table of Contents now reflects correct page numbers rather than item numbers.

Clients who received a prior version of this brochure should read this document in its entirety.

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Note: Massachusetts securities regulations under 950 CMR 12.205(8)(a)2 separately require that a Stand-Alone Table of Fees for Services be prepared and delivered to clients alongside this brochure. That document is provided to each client as a separate disclosure at or before the time of contracting for services and is not reproduced within this Form ADV Part 2A.

Item 4 — Advisory Business

Augēo Wealth Management, LLC ("Augēo" or the "Firm") was formed in 2026 and is registered as an investment adviser with the Massachusetts Securities Division, effective September 23, 2026. The Firm is principally owned and managed by Walter Garbacik, who serves as Principal, Chief Compliance Officer (CCO), and sole Investment Adviser Representative (IAR). Our offices are located at 3 Stonemeadow Drive, Westwood, Massachusetts 02090.

Augēo Wealth Management operates on a strictly fee-only, fiduciary basis. The Firm does not accept commissions of any kind, does not sell insurance products, and does not receive compensation from any third party in connection with client referrals or recommendations. Walter Garbacik's Massachusetts insurance license is being allowed to expire and the Firm no longer engages in insurance brokerage or consulting of any kind.

Services Offered

Comprehensive Wealth Management

Our flagship offering integrates financial planning and investment management into a single ongoing advisory relationship. Services include: retirement planning, estate and legacy planning, tax-efficient investing, cash flow and budgeting analysis, education funding, risk management analysis, Social Security optimization, and portfolio construction and management. Financial planning is fully integrated into the AUM-based advisory relationship at no additional charge.

Portfolio Management

Discretionary or non-discretionary investment management for clients who seek standalone portfolio oversight. We develop a customized Investment Policy Statement (IPS) and manage a diversified portfolio of exchange-traded funds (ETFs), individual securities, fixed income, and where appropriate, alternative investments, based on the client's stated risk tolerance and objectives.

Standalone Financial Planning

For clients who seek financial planning advice without a portfolio management mandate, we offer fixed-fee engagements covering retirement, estate, tax strategy, insurance analysis, cash flow, and education planning. See Item 5 for the fixed fee schedule applicable to standalone financial planning.

Clients may impose reasonable restrictions on the management of their accounts. Any restrictions should be communicated in writing so that they may be documented and applied consistently. We provide advisory services on both a discretionary and non-discretionary basis, as detailed in each client's signed Investment Advisory Agreement.

Augēo Wealth Management does not participate in any wrap fee program.

As of December 31, 2025, Augēo Wealth Management manages approximately $0 in regulatory assets under management on behalf of approximately 0 clients. As a newly formed firm, these figures will be updated annually as of each December 31 fiscal year end and reported in our annual Form ADV amendment.

Item 5 — Fees and Compensation

Augēo Wealth Management is a fee-only firm. We do not accept commissions, referral fees, finder's fees, or any other third-party compensation. All fees are described below and will be detailed in each client's Investment Advisory Agreement.

A. AUM-Based Advisory Fee (Comprehensive Wealth Management & Portfolio Management)

Our primary fee is an annual advisory fee calculated as a percentage of assets under management (AUM), billed quarterly in arrears. Fees are prorated for partial periods. The graduated blended fee schedule is as follows:

AUM Tier	Annual Fee Rate
First $250,000	1.50%
Next $250,000 ($250,000.01–$500,000)	1.25%
Next $500,000 ($500,000.01–$1,000,000)	1.00%
Next $4,000,000 ($1,000,000.01–$5,000,000)	0.75%
Amount over $5,000,000	0.50% (negotiable)

Blended effective rates (approximate): $250,000 account — 1.50% ($3,750/year); $500,000 — 1.375% ($6,875/year); $1,000,000 — 1.1875% ($11,875/year); $2,000,000 — 0.96875% ($19,375/year). A minimum AUM of $250,000 is generally required. Fees are negotiable based on account size, complexity, anticipated growth, related accounts, and overall relationship scope.

Fees are typically deducted directly from client accounts held at the qualified custodian (Schwab Advisor Services) upon written client authorization. The custodian sends quarterly account statements showing all activity, including fee deductions. Clients should review these statements carefully. Alternatively, clients may elect to pay fees by check or ACH transfer.

The AUM fee covers comprehensive financial planning integrated with portfolio management. Clients enrolled in comprehensive wealth management receive full financial planning services as part of their AUM fee — no separate financial planning fee is charged in that context.

B. Standalone Financial Planning Fee (Fixed Fee)

For clients who engage Augēo for financial planning services without a concurrent portfolio management mandate, we charge a fixed fee based on the scope and complexity of the engagement. These fees are disclosed in the client's Financial Planning Agreement prior to the commencement of services.

Engagement Type	Fee Range
Basic Financial Plan (single-focus)	$1,500 – $2,500
Comprehensive Financial Plan	$2,500 – $4,000
Complex/Multi-Goal Plan (business, estate, tax)	$4,000 – $5,000

Fixed fees and any applicable hourly rate are determined before the engagement begins, disclosed in writing, and are not contingent on any action or outcome. Fixed fees are due upon completion of the engagement unless a different payment schedule is stated in the signed Financial Planning Agreement. The typical payment schedule is one-half of the fixed fee due upon execution of the Financial Planning Agreement and the remaining one-half due upon delivery of the financial plan, as set forth in the Financial Planning Agreement. If a client paid a standalone financial planning fee within the twelve months before entering an ongoing portfolio-management or comprehensive-wealth-management engagement, that planning fee will be credited dollar-for-dollar against the first period's AUM advisory fee.

Standalone financial planning compensation is reported on Form ADV Part 1A, Item 5E as fixed and hourly fees, as applicable.

C. Performance-Based Fees

Augēo Wealth Management does not charge performance-based fees.

D. Other Fees and Expenses

Clients may incur fees and expenses charged by third parties that are separate from and in addition to Augēo's advisory fees. These include, but are not limited to: custodian fees charged by Schwab Advisor Services, transaction costs, mutual fund or ETF expense ratios, and any account maintenance fees. Augēo does not share in these third-party fees and does not receive any portion of them.

E. Insurance

Augēo Wealth Management does not sell, broker, or advise on insurance products and does not receive insurance commissions of any kind. Walter Garbacik's Massachusetts insurance license is being allowed to expire. When insurance analysis is relevant to a client's comprehensive financial plan, Augēo will analyze the client's insurance needs and may refer the client to independent, unaffiliated insurance providers. No referral fees or compensation of any kind is exchanged in connection with such referrals. The Firm maintains an arm's-length relationship with any insurance provider to whom clients may be referred.

F. Termination

Either party may terminate the Investment Advisory Agreement upon written notice. Upon termination, fees will be prorated through the termination date and any unearned prepaid fees will be refunded promptly. For standalone financial planning engagements, the specific termination terms will be set forth in the Financial Planning Agreement.

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

Augēo Wealth Management does not charge performance-based fees and does not engage in side-by-side management. All clients are charged on the AUM or fixed-fee basis described in Item 5.

Item 7 — Types of Clients

Augēo Wealth Management provides advisory services to:

- High-net-worth individuals and families (primary clientele)
- Pre-retirees and retirees
- Small business owners seeking integrated personal and business financial planning
- Trusts and estates (as directed by the trustee or executor)

A minimum account size of $250,000 in investable assets is generally required to establish an advisory relationship. We may accept smaller accounts at our discretion, potentially at higher effective fee rates to reflect the effort required to serve the relationship.

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

Methods of Analysis

Augēo employs a fundamental, long-term investment approach grounded in the following analytical frameworks:

- Macroeconomic Analysis: Assessment of interest rate environments, economic cycles, fiscal and monetary policy, and their impact on asset class valuations and sector performance.
- Fixed Income Analysis: Duration management, yield curve positioning, credit quality assessment, and sector allocation across taxable and tax-exempt fixed income markets. Walter Garbacik brings 30+ years of institutional fixed income experience, including direct management of $30B+ in municipal bond assets at Fidelity.
- Equity Analysis: Fundamental analysis of individual equities and ETF structures, including valuation, earnings quality, sector dynamics, and capital structure.
- Portfolio Construction: Modern Portfolio Theory-informed construction emphasizing diversification, risk-adjusted return optimization, and tax efficiency through asset location.
- Financial Planning Integration: Investment strategy is built directly from each client's financial plan, including tax situation, time horizon, liquidity needs, income requirements, and estate goals.

Investment Strategies

Primary investment strategies employed include:

- Long-term buy-and-hold in diversified ETF portfolios (core strategy for most clients)
- Individual bond laddering for fixed income clients with specific duration or income objectives
- Tax-loss harvesting and tax-efficient rebalancing
- Concentrated position management and diversification strategies
- Asset allocation glidepath management for pre-retirees and retirees

Alternative Investments and Real Asset Exposure

For suitable clients, Augēo may allocate a portion of the portfolio to alternative investments or real asset exposures. These allocations are made only where consistent with the client's Investment Policy Statement, risk tolerance, liquidity needs, and investment horizon. The following categories may be used:

- Real Estate Investment Trusts (REITs): Publicly traded REITs or REIT ETFs providing exposure to commercial, residential, or specialty real estate. These are exchange-traded and highly liquid.
- Commodities: ETFs providing exposure to broad commodity indices, precious metals (e.g., gold), or energy commodities as inflation hedges or portfolio diversifiers.
- Inflation-Protected Securities: U.S. Treasury Inflation-Protected Securities (TIPS) or TIPS ETFs for clients seeking explicit inflation protection.
- Interval Funds / Non-Traded REITs / Private Credit Funds (limited use): For eligible clients with sufficient liquidity elsewhere, Augēo may recommend publicly registered but non-listed alternative investment vehicles that offer access to private real estate, private credit, or infrastructure. These are used only in limited circumstances and for clients who meet applicable suitability standards.
- Infrastructure and Natural Resources: ETFs or closed-end funds providing exposure to energy infrastructure, utilities, or natural resources as real-return-generating portfolio components.

Material Risks of Alternative and Real Asset Investments

Investing in alternative investments and real assets carries material risks beyond those associated with traditional stocks and bonds. Clients should carefully consider the following:

- Liquidity Risk: Non-traded REITs, interval funds, and certain private credit vehicles have limited or restricted redemption rights. Clients may not be able to access their capital on short notice. These investments are appropriate only for clients who do not require immediate liquidity from the allocated portion.
- Valuation Risk: Non-listed alternatives may be valued infrequently (monthly or quarterly) and the stated NAV may not reflect the price at which the investment could be sold. Valuations may lag changes in market conditions.
- Concentration Risk: Allocating to a specific real asset sector (e.g., office real estate, energy infrastructure) concentrates risk in that sector. Sector downturns may disproportionately impact the value of these holdings.
- Regulatory and Tax Complexity: REIT distributions, commodity fund tax treatment (including potential K-1 reporting), and TIPS tax treatment (phantom income) add complexity to tax planning and reporting.
- Interest Rate Risk: REITs and infrastructure investments are sensitive to rising interest rates, which can reduce their valuations and distributions.
- Commodity Price Volatility: Commodity exposures are subject to significant price volatility driven by supply/demand dynamics, geopolitical events, and currency fluctuations.
- Manager and Structure Risk: For interval funds and non-traded vehicles, the quality of the underlying manager, the fund structure, and the fee load are material to performance. These vehicles typically carry higher fees than ETFs.

All investments involve risk of loss, including the possible loss of principal. Past performance is not indicative of future results. Augēo will disclose and discuss the specific risks of any alternative or real asset recommendation with each client prior to implementation.

Item 9 — Disciplinary Information

Registered investment advisers are required to disclose material facts about any legal or disciplinary events that would be material to a client's evaluation of the firm or its personnel.

Augēo Wealth Management, LLC has no reportable disciplinary events. Walter Garbacik, the Firm's sole IAR and CCO, has no reportable disciplinary events.

Clients and prospective clients may obtain the disciplinary history of Augēo Wealth Management or its representatives at any time by contacting the Massachusetts Securities Division at (617) 727-3548, One Ashburton Place, 17th Floor, Boston, Massachusetts 02108, or online at www.sec.state.ma.us. Information is also available through the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 10 — Other Financial Industry Activities and Affiliations

Walter Garbacik, the Firm's sole Principal and IAR, is not registered and does not have a pending application to register as a broker-dealer or broker-dealer representative, futures commission merchant, commodity pool operator, commodity trading adviser, or associated person of any of the foregoing.

Walter Garbacik's Massachusetts insurance license is currently being allowed to expire. The Firm does not engage in insurance brokerage, agency, or consulting of any kind and does not receive insurance commissions. When insurance coverage is relevant to a client's financial plan, the Firm will refer the client to independent, unaffiliated insurance providers, with no referral fee or compensation exchanged in either direction.

Anabolyc, LLC, a prior business entity of Walter Garbacik, has been fully dissolved and is no longer operational. It is not disclosed as an active other business activity.

Augēo Wealth Management has no related persons that are broker-dealers, investment companies, other investment advisers, financial planners, insurance companies or agencies, pension consultants, real estate brokers, or sponsors of limited partnerships.

Privacy Policy and Non-Public Personal Information

Augēo Wealth Management is committed to protecting the privacy of client non-public personal information (NPI). Massachusetts law — specifically 950 CMR 12.205(9)(c)13 — requires that a state-registered investment adviser obtain an affirmative, signed opt-in consent from clients before sharing NPI with any non-affiliated third party.

Augēo's policy is as follows:

- We do not disclose NPI to a non-affiliated third party unless disclosure is required by law or the client has first provided affirmative, written opt-in consent identifying the recipient or category of recipient and the information authorized to be disclosed.
- **Non-affiliated professionals:** When a client asks us to coordinate with an estate attorney, CPA, elder-law attorney, insurance professional, or other outside professional, we will obtain the client's signed opt-in consent before sharing NPI. The consent will identify the professional and the authorized scope of disclosure.
- **Affiliates:** Augēo has no affiliated third parties and does not share NPI with affiliates.
- **Non-affiliated service providers:** The Firm currently uses or anticipates using Schwab Advisor Services (custody and brokerage), RightCapital (financial planning), Wealthbox (client relationship management), Smartria (compliance support), and DocuSign (electronic signatures). Each is non-affiliated with Augēo. NPI is disclosed to these providers only to the extent necessary to deliver the authorized service. Because each provider is a non-affiliated third party, the client's prior signed opt-in consent is required before NPI is disclosed, except where disclosure is required by law.

At onboarding, each client receives the Firm's Privacy Policy. Before any disclosure requiring consent, the client receives a separate opt-in authorization naming the recipient or recipient category and describing the permitted disclosure. Consent is not a condition of receiving advisory services unless the disclosure is necessary to provide a service requested by the client. A client may revoke consent prospectively at any time in writing.

A copy of Augēo's Privacy Policy is available upon request and will be delivered to all clients at onboarding and upon any material update.

Physical Security and Cybersecurity Policies

Augēo Wealth Management maintains the following physical security and cybersecurity policies to prevent the misuse of clients' material non-public information:

- Physical Security: Client files and records are maintained in encrypted digital format. Physical documents containing NPI are stored in a locked home office accessible only to Walter Garbacik. Visitors are not permitted in the workspace where client information is accessed.
- Device Security: All devices used for client-related work (laptop, mobile, Mac Mini server) are protected with strong passwords and biometric authentication. Full-disk encryption is enabled on all devices.
- Software and Access Controls: Client information is accessed only through password-protected, multi-factor-authenticated platforms (Schwab, RightCapital, Wealthbox, Smartria). Shared or public computers are never used to access client systems.
- Data Transmission: Client NPI transmitted electronically is encrypted. Password-protected, encrypted files are used when transmitting documents via email.
- Incident Response: In the event of a suspected data breach or unauthorized access, Walter Garbacik will immediately assess the scope, take steps to contain the breach, notify affected clients as required by law, and contact legal counsel.
- Annual Review: Cybersecurity policies are reviewed annually as part of the Firm's annual compliance review.

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

Augēo Wealth Management has adopted a Code of Ethics (the 'Code') in compliance with SEC Rule 204A-1 and 950 CMR 12.000. The Code establishes standards of conduct for all supervised persons of the Firm, addresses conflicts of interest, and requires compliance with applicable securities laws. A copy of the Code of Ethics will be provided to any client or prospective client upon request.

The Code requires that all supervised persons place clients' interests ahead of their own and conduct personal securities transactions in a manner consistent with the Code. Key provisions include:

- Pre-clearance of personal trades in reportable securities
- Reporting of all personal securities transactions and holdings
- Prohibition on trading in client securities on material non-public information
- Annual certification of compliance with the Code

Walter Garbacik, as the Firm's sole IAR, may invest in the same securities or asset classes that are recommended to clients. This presents a potential conflict of interest. To manage this conflict: client trades are executed prior to or contemporaneously with personal trades; Walter will not front-run client orders; and all personal trading is subject to the Code's pre-clearance and reporting requirements. Augēo Form ADV Part 1A, Item 8A(2) is updated to reflect 'Yes' — personnel may buy or sell the same securities as those recommended to client accounts.

Item 12 — Brokerage Practices

Augēo Wealth Management has selected Schwab Advisor Services as its primary custodian and broker-dealer. Schwab was selected based on the quality and reliability of its execution, the breadth of its platform for registered investment advisers, the strength of its technology and reporting infrastructure, and its competitive fee structure. Augēo does not receive any compensation from Schwab in exchange for directing client business.

Schwab may provide Augēo with access to research, software, and other services that benefit the Firm's advisory business. This represents a potential conflict of interest, as the availability of such services may influence Augēo's decision to continue using Schwab as custodian even if lower execution costs might be available elsewhere. We believe, however, that Schwab provides best execution for our clients and that the overall relationship is in clients' best interests.

Augēo does not engage in soft dollar arrangements.

We do not aggregate or 'batch' client trades at this time, given the size of the Firm. As the Firm grows, we may implement trade aggregation policies to ensure equitable treatment across client accounts.

Item 13 — Review of Accounts

Walter Garbacik reviews each client's portfolio and financial plan on a continuous basis and conducts a formal comprehensive review at least annually. More frequent reviews are triggered by material changes in a client's financial situation, market conditions, tax law changes, or client request.

Clients receive:

- Quarterly account statements directly from Schwab Advisor Services showing all account activity, holdings, and fee deductions
- Annual written performance report and financial plan update from Augēo
- Ad hoc written reports or summaries upon client request

Clients are encouraged to contact Walter Garbacik at any time with questions or to report changes in their financial circumstances.

Item 14 — Client Referrals and Other Compensation

Augēo Wealth Management does not pay referral fees to any third party and does not receive referral fees from any third party. The Firm does not participate in any solicitor arrangement.

Augēo operates a 'quarterback' coordination model in which we may refer clients to estate attorneys, CPAs, elder law attorneys, and other professionals as appropriate to the client's needs. These referrals are made solely in the client's best interest. No compensation is exchanged in either direction in connection with such referrals.

Augēo does not receive any economic benefit from any third party in connection with advice given to clients.

Item 15 — Custody

Augēo Wealth Management does not maintain physical custody of client assets. All client assets are held at Schwab Advisor Services, a qualified custodian. Clients will receive account statements directly from Schwab at least quarterly. Clients should carefully review these statements and compare them to any reports received from Augēo.

Notwithstanding the foregoing, Augēo Wealth Management will be deemed to have custody of client assets by virtue of our authorization to deduct advisory fees directly from client custodial accounts. In accordance with 950 CMR 12.205(5), Augēo complies with the following:

- Each client provides written authorization in the applicable Investment Advisory Agreement before Augēo instructs Schwab to deduct advisory fees directly from the client's account.
- The Firm uses a third-party fee calculation service to calculate each advisory fee using the blended graduated fee schedule and billing terms established in the applicable client agreement. Walter Garbacik reviews and approves each billing run and verifies the calculation for accuracy. Upon approval, the Firm transmits the approved fee information to Schwab Advisor Services for deduction. Each time a fee is deducted, the Firm simultaneously delivers to both Schwab Advisor Services and the client a written invoice or fee statement identifying the billing period, account value used, applicable fee rate, calculation methodology, and dollar amount of the fee.
- Schwab sends quarterly account statements to clients showing all account activity, including all fee deductions.
- Clients are encouraged to compare Augēo's fee invoices against the fee deductions shown on Schwab's statements.

Augēo does not otherwise have custody of client assets, does not hold client funds or securities, and does not have the ability to direct transfers or distributions other than fee deductions.

Item 16 — Investment Discretion

Augēo Wealth Management generally manages client accounts on a discretionary basis, meaning we have authority to make investment decisions and execute transactions without obtaining prior client approval for each transaction. Discretionary authority is granted by the client in the signed Investment Advisory Agreement and is limited by any investment guidelines or restrictions set forth in the client's Investment Policy Statement.

Some clients may elect non-discretionary management, under which Augēo provides investment recommendations but the client must approve each transaction before execution.

Business Continuity Plan

In accordance with SEC Release No. IA-2204 and 950 CMR 12.205(9)(b), Augēo Wealth Management maintains a Business Continuity Plan (BCP) designed to protect clients' interests in the event of a significant business disruption.

The BCP addresses the following:

- Natural Disaster or Office Displacement: Augēo operates primarily from a home office. In the event of displacement due to a natural disaster, flood, fire, or other physical disruption, client accounts are held at Schwab Advisor Services and remain fully accessible. Walter Garbacik will maintain the ability to access client accounts and provide advisory services remotely via laptop and secure internet connection. Backup copies of client records and firm documents are maintained in encrypted cloud storage accessible from any location.
- **Temporary Incapacitation of Key Personnel:** In the event Walter Garbacik is temporarily unable to provide advisory services, the Firm's continuity procedures call for prompt assessment of the expected duration, notification to affected clients when appropriate, preservation of client access to assets held at Schwab, and engagement of a properly licensed and registered professional only after the necessary agreements, authority, and regulatory requirements are satisfied. No backup professional may trade, access NPI, or act for a client without lawful authority.
- **Permanent Incapacitation or Death of Key Personnel:** Because Augēo is a sole-practitioner firm, permanent incapacity or death presents a material continuity risk. The Firm's plan provides for prompt notification to clients, Schwab, and the Massachusetts Securities Division as appropriate; preservation and controlled access to required books and records; suspension of advisory activity by unauthorized persons; assistance to clients who elect to retain another adviser; and an orderly wind-down or lawful succession arrangement that prioritizes client interests. Client accounts will not be assigned or transferred to another adviser without any consent required by the advisory agreement and applicable law.
- Technology Disruption: Augēo uses cloud-based platforms (Schwab, RightCapital, Wealthbox, Smartria) that remain accessible regardless of local hardware failure. The Firm's Mac Mini server is backed up to encrypted cloud storage daily.

The BCP is reviewed at least annually and updated as needed to reflect changes in the Firm's operations, personnel, and technology infrastructure.

Item 17 — Voting Client Securities

Augēo Wealth Management does not vote client proxies. Clients retain the right and responsibility to vote their own proxies. Proxy materials will be sent directly to clients by Schwab Advisor Services or the relevant issuer.

Clients who have questions about a particular proxy matter are welcome to contact Walter Garbacik for information, though the decision to vote and the manner of voting remains solely with the client.

Item 18 — Financial Information

Augēo Wealth Management does not require or solicit prepayment of more than $500 in fees per client more than six months in advance of services rendered, and therefore is not required to include an audited balance sheet in this brochure.

Augēo Wealth Management has no financial condition that is reasonably likely to impair the Firm's ability to meet contractual commitments to clients.

Augēo Wealth Management has not been the subject of a bankruptcy petition at any time.

Item 19 — Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons

Walter Garbacik — Principal, Chief Compliance Officer, and sole Investment Adviser Representative

Mr. Garbacik earned a B.A. in Political Science from Providence College in 1993, holds the Series 65 (Uniform Investment Adviser Law Examination), and brings approximately 30 years of institutional finance experience, including:

- Fixed Income Sales, Goldman Sachs, Morgan Stanley, and Lehman Brothers (early career)
- Fidelity Management and Research: Fixed Income Sales Manager; Fixed Income Portfolio Analyst (London office); Head Municipal Bond Trader overseeing $30B+ in municipal bond assets
- Augēo Wealth Management, LLC — Principal, CCO, IAR (2026 – present)

B. Other Business Activities

Walter Garbacik is not actively engaged in any other business activity outside of Augēo Wealth Management, LLC. Walter Garbacik's Massachusetts insurance license is being allowed to expire; no insurance activity of any kind is conducted. Anabolyc, LLC, a prior business entity, has been fully dissolved and is not an active business.

C. Performance-Based Compensation

Augēo Wealth Management does not charge performance-based compensation.

D. Disciplinary History

Walter Garbacik has no disciplinary events required to be disclosed pursuant to Item 19.D of Part 2A. Clients may obtain the disciplinary history of the Firm or its representatives from the Massachusetts Securities Division at (617) 727-3548 or www.sec.state.ma.us.

E. Material Relationships with Issuers

Neither Augēo Wealth Management nor Walter Garbacik has any relationship or arrangement with any issuer of securities that is not already disclosed in Item 10 of this brochure.

F. Clients Over Age 65 — Policies and Procedures

Augēo Wealth Management anticipates serving clients who are over the age of 65, including pre-retirees and retirees. The Firm has adopted the following policies and procedures for serving older clients and for recognizing and responding to potential diminished capacity:

- Initial Assessment: At onboarding, we discuss each client's investment experience, cognitive health to the extent voluntarily disclosed, and the client's preferences for involving trusted family members or advisors in financial decision-making.
- Trusted Contact Person: In accordance with FINRA Rule 4512 best practices, Augēo requests that each client over age 65 designate a trusted contact person who may be contacted if Augēo has concerns about the client's well-being, account activity, or possible financial exploitation. The trusted contact is not authorized to make financial decisions on behalf of the client.
- Monitoring for Diminished Capacity: Walter Garbacik will be alert to signs that may indicate diminished capacity, including: unusual or out-of-character instructions, requests inconsistent with established

investment goals, signs of confusion about account status or prior discussions, or evidence of third-party pressure or financial exploitation.

- Response Protocol: If diminished capacity is suspected, Walter Garbacik will: (1) document the observation in writing; (2) take no action on unusual or concerning instructions pending further review; (3) contact the designated trusted contact person if authorized to do so; and (4) consult legal counsel regarding obligations under Massachusetts elder law before any account action is taken.
- Training: Walter Garbacik will complete annual training on recognizing and responding to elder financial exploitation and diminished capacity.
- Regulatory Reporting: To the extent required by Massachusetts law, Augēo will report suspected financial exploitation of an elder client to the appropriate authorities.