

DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1

Part 2A of Form ADV: Firm Brochure



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Firm IARD/CRD #: 126877

AllGen Financial Advisors, Inc.
REGISTERED INVESTMENT ADVISOR

This Disclosure Brochure provides information about the qualifications and business practices of AllGen Financial Advisors, Inc., which should be considered before becoming a client. You are welcome to contact us should you have any questions about the contents of this brochure – our contact information is listed to the right. Additional information about AllGen Financial Advisors, Inc. is also available on the SEC’s website at www.adviserinfo.sec.gov.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term “registered investment advisor” is not intended to imply AllGen Financial Advisors, Inc. has attained a certain level of skill or training.

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BROCHURE
DATED

1
JANUARY
2026



MATERIAL CHANGES

SEC Rule 204-3(b)(2) allows us to provide you with a summary page of Material Changes in lieu of sending out our entire Disclosure Brochure. If you are being offered this Material Change page as a separate piece from our Disclosure Brochure and you have questions about these summary disclosures or would like a current copy of our Disclosure Brochure to review, **you may contact us, and a current, complete Disclosure Brochure will be sent free of charge.**

Revised Portfolio Management Fee Schedule

We have updated our fee structure disclosed in this Disclosure Brochure for portfolio management services. There have been no changes to our billing—accounts will continue to be billed quarterly in advance—and management fees remain asset-based. All fees will be calculated according to this revised fee schedule:

Portfolio Value	Annual Fee Rate Negotiable	Qualified Plan Management Non-Negotiable	AllGen Crypto Altshield Non-Negotiable
First \$1,000,000	1.00%	0.50%	1.25%
Next \$1,000,000	0.90%	0.50%	1.25%
Next \$1,000,000	0.80%	0.50%	1.25%
Next \$1,000,000	0.70%	0.50%	1.25%
Next \$1,000,000	0.60%	0.50%	1.25%
Next \$5,000,000	0.50%	0.50%	1.25%
Next \$15,000,000	0.40%	0.50%	1.25%
Next \$25,000,000	0.30%	0.50%	1.25%
Next \$50,000,000	0.25%	0.50%	1.25%
Over \$100,000,000	0.20%	0.50%	1.25%

For a complete breakdown on how fees will be calculated and billed to accounts, please see our Disclosure Brochure under “Portfolio Management Fee” in Item 5, “Fees & Compensation”.

In addition, the AllGen Crypto AltShield Portfolio® is a new strategy we are offering. It is an **algorithm-based investment strategy** that utilizes FINIAT’s Intelligent Allocation model to gain exposure to cryptocurrency exchange-traded funds (ETFs). For additional information, please see “AllGen Crypto AltShield Portfolio” under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss” section in this Disclosure Brochure.

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This brief is being provided to you as a summary of what has been fully disclosed in our Disclosure Brochure dated January 1, 2026. The information contained on this Material Change page has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator.

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BROCHURE SUPPLEMENTS



ADVISORY BUSINESS

Who We Are

AllGen Financial Advisors, Inc. (hereinafter referred to as “AllGen”, “we”, “us” and “our”) is a **fee-based**¹ registered investment advisor² offering personalized asset management and financial planning services³ to assist you, our client⁴, with creating financial stability and security and the financial independence you desire.

Our History

AllGen began offering advisory services as Good Risk Reward, Inc. in 2003 under the leadership of Jason Martin. In April of 2007, AllGen expanded their advisory services, brought in Paul Roldan as a majority shareholder, and changed the name to reflect the professional services being offered to **all generations**.

Owners

The following persons control AllGen:

Name	Title	CRD#
Paul Roldan	Chief Executive Officer & Chief Compliance Officer	2682260
Jason C. Martin	Chief Investment Officer	3259475

Mission

AllGen promotes financial wisdom to **all generations** in the pursuit of financial freedom through sound advice.

Vision

A society that is financially wise and fulfilling their calling.

Assets Under Management

As of December 31, 2025, our assets under management totaled:

Client Discretionary Managed Accounts	\$475,182,812
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We do not offer non-discretionary investment management services.

¹ As a “fee-based” investment advisor, the compensation we receive can include sales commissions in addition to the compensation paid by you, our client, for the portfolio management services we provide. See Item 10, “Other Financial Industry Activities & Affiliations” and Item 14, “Client Referrals & Other Compensation” for disclosure on these services.

² The term “registered investment advisor” is not intended to imply that AllGen Financial Advisors, Inc. has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as a licensed “investment advisor” with the United States Securities & Exchange Commission – and “Notice Filed” with State Regulatory Agencies that have limited regulatory jurisdiction over our business practices.

³ AllGen Financial Advisors, Inc. is a **fiduciary**, as defined within the meaning of Title I of the Employer Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for **any asset management and financial planning services provided to a client who is:** (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or (ii) the beneficial owner of an Individual Retirement Account (“IRA”).

⁴ A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, another fiduciary, a retirement plan, or any other type of entity to which we choose to give investment advice.



What We Do

We offer **financial solutions** that stress the importance of you making fiscally responsible decisions and disciplined economic choices in your personal life so we can effectively help you achieve your monetary goals for **today's needs, tomorrow's dreams**, and implement a strategy to build a **lasting legacy** for future generations. Our services include:

Portfolio Management

Our Portfolio management strategies focus on designing a portfolio allocation of primarily Exchange Traded Funds ("ETFs") with the occasional mix of equity ("stock") positions, debt instruments (bonds), investment company ("mutual fund") products to achieve the best return on your investment capital.

With the complexity of today's marketplace, it is critical for us to understand who you are and what you want to accomplish financially. Our initial meetings with you, and the profile questionnaires⁵ we have you complete, help us have a clearer picture of your personal finances, investment return expectations, time horizon, and risk tolerance so that we can develop a successful investment strategy and tailored asset allocation guideline unique to your investment objectives. If you have difficulty expressing your monetary needs or do not truly have a grasp of your overall personal finances, a financial plan may be suggested before proceeding with any portfolio management services.

Our meetings with you to discuss your finances, and, if necessary, develop a financial plan, will help to eliminate much of the guesswork in achieving the security and independence you desire and simplify your financial alternatives. In return, we will have:

- ❖ Defined and narrowed objectives and investment options;
- ❖ Identified areas of greatest distress;
- ❖ Developed a strategy for addressing concerns about the future;
- ❖ Cultivated peace of mind; and,
- ❖ Created a unique picture of your overall economic personality.

Once your financial parameters have been identified, we will prepare a policy allocation statement that outlines what asset mix is most suitable for your unique investment expectations and risk tolerance. This investment plan will guide us in the management of your account(s), and as a standard against which to measure future results and to make modifications where necessary.

You will find more information about our management fees and services under "Portfolio Management Fee" in Item 5, "**Fees & Compensation**" and further description of our management style under Item 8, "**Methods of Analysis, Investment Strategies & Risk of Loss**".

Financial Planning

Financial planning is one of the most important tools that successful people use to achieve financial freedom in their personal lives. Planning requires a lifetime commitment that demands you control your finances versus your finances controlling you. Acquiring wealth is a byproduct of good planning but irrelevant to the ultimate objective of achieving financial freedom. Financial freedom is the point at which your current lifestyle is sustainable in future years based on the assets and/or income streams

⁵ The profile questionnaires we use are important tools in gathering information about your investment methodology, risk tolerance, income/tax bracket, liquidity, time horizons, etc. If you elect not to answer these questionnaires or choose to respond with limited input, it is possible that we could operate in a handicapped capacity contrary to your investment needs. Therefore, if you desire the most effective and accurate recommendations regarding your managed account(s), you should make every effort to provide us with your detailed personal needs and objectives, along with detailed financial and tax information.



you have accumulated during your lifetime. Therefore, the economic solutions we develop in a financial plan are designed to first achieve financial freedom and second acquire wealth.

Preparing the Financial Plan

We have identified three (3) life stages that one needs to go through in order to reach financial freedom; these life stages are called Foundation, Formation and Freedom. Each life stage has a certain number of objectives that need to be accomplished before moving on to the next stage. These life stages and their respective objectives are designed to be completed in order, as they build upon one another. Below are the 3 life stages and the planning involved for each.

Foundation Life Stage

The path to financial freedom starts with setting the foundation. When you complete this life stage, you should have peace of mind, knowing that you have built a reserve for life's unfortunate events (losing a job, having a serious health problem, major home or car repair, etc.) and you will be ready to start building wealth. The areas of your financial plan that will be covered in this life stage are:

- ❖ Understand the Net Worth Statement.
- ❖ Understanding how to implement & utilize a Cash Flow Statement (Budget/Spending Plan).
- ❖ Proper Life Insurance.
- ❖ Proper Disability Insurance.
- ❖ Simple Will – Basic Estate Planning.
- ❖ Build an Emergency Account – the equivalent of 3-6 months of expenses at minimum.
- ❖ Eliminate all debt except mortgage (Credit Card, Student Loan, Car Loan, Personal Loans, etc.).

Formation Life Stage

The Formation Life Stage is where you build for your future. This stage focuses on knowing how much to save and where to invest so that you can build up enough to reach financial freedom. Should I save for my child(ren)'s college education? How much house can you afford and what type of mortgage is most appropriate? What is the best way to pay off the mortgage? By the end of this life stage, you should be completely debt free and have enough accumulated assets so that you are financially secure. The Foundation Life Stage must be completed before beginning the Formation Life Stage. The areas of your financial plan that will be covered in this life stage are:

- ❖ Financial Freedom Plan (Retirement Plan) – Determine how much is needed to reach financial freedom and how to maximize retirement savings account(s) and all other investments.
- ❖ Education Savings Plan – Determine how much to save and where to invest for child(ren)'s college education.
- ❖ Entrepreneurs – Assist and collaborate with the CPA and/or business attorney on the business entity formation and establishing small business retirement plan.
- ❖ Asset Allocation and Portfolio Analysis – Analyze asset allocation and investment portfolio. Make recommendations to ensure that assets are diversified and implemented properly in order to meet financial goals.
- ❖ Pay off mortgage(s) – You are completely debt free!
- ❖ Long-Term Care – Determine if you should self-fund or use insurance to help pay for the rising costs of receiving skilled care with the six activities of daily living, whether it be in the home or away from the home.



Freedom Life Stage

The Freedom Life Stage is the ultimate goal. Here you are free to live life on your terms. This life stage focuses on **impact** and **legacy**. How do you want to use your talents, time and financial resources? What legacy would you like to leave behind for your family, future generations and your community? **All objectives in the Foundation and the Formation stages must be completed before beginning the Freedom Life Stage.** The areas of your financial plan that will be covered in this life stage are:

- ❖ Estate Planning – Assist with the coordination and implementation of your legally drafted estate planning documents, which may consist of wills, trusts, etc. These documents are your instructions on how to transfer your assets upon your death as well as how to care for you and your assets while you are alive but are limited – physically or cognitively – to do so yourself.
- ❖ Legacy Education – Beyond just impact investing, you may want to use your wealth in ways that are meaningful and will have an impact on society: explore Charitable Gift Giving strategies.
- ❖ Healthcare Needs Review – Maintaining medical/health insurance in place prior to Medicare age and after: Medicare does not pay for Long Term Care, hence revisiting this risk is important.
- ❖ Asset Allocation and Portfolio Analysis – Make recommendations to align financial needs, goals and risk tolerance.
- ❖ Income Distribution Analysis – Determine distribution order to meet needs, while maintaining sustainability
- ❖ Social Security Benefits Review – Determine retirement age to file for benefits, considering any spousal strategies to optimize lifetime benefits for recipients and surviving spouse.

You will find more information about our financial planning fees under “Financial Planning Fee” below in Item 5, “**Fees & Compensation**”.

Business and Corporate Planning

Business and corporate planning is forward thinking; projecting thought into the future to plan for tomorrow's needs and stay one step ahead of the competition. It involves formulating and implementing decisions about the company's present and future direction in accordance with the company's goals as set out in a strategic plan or other such document.

Business and Corporate Planning Composition

Business and Corporate Planning is a blueprint for present/future policy and resource decisions. It guides day-to-day organizational choices, provides a measurement tool to evaluate progress; assists with managing the “big picture”, and guides with preserving a positive cash flow. We work with your management team in the following areas:

- ❖ Define Goals – Discover and help prioritize short and long-term planning goals and aspirations with the business.
- ❖ Plan for Performance – Identify business life cycle transitions that you are experiencing and expect to be experiencing.
- ❖ Business Risk Management – Analyze your current insurance documents in comparison to business continuation and risk retention goals.
- ❖ Employee Benefits – Assist in determining the optimal employee benefit package to maximize employee performance and retention.



- ❖ Develop a Key-Man Policy – Implement a Key-Man reward and retention plan to reward key executives and to retain employees.
- ❖ Business Owner and Employee Retirement Planning – Analyze or develop pension plans to assure that you meet the fiduciary responsibilities to plan participants.
- ❖ Business Transition and Exit Planning – Provide plan development and implementation tools for your transition to retirement.
- ❖ Design a Business Financial Plan – Provide written recommendations and alternatives to help you achieve stated business financial and employee goals.
- ❖ Offer Pension Consulting Services – Help to implement financial decisions and to coordinate the necessary financial product providers.

Preparing the Business and Corporate Plan

We gather the necessary information to complete our analysis through personal interviews and review of various documents you supplied. Information gathered may include statements regarding your current financial status, a list of assets, insurance, wills and/or trust documents, income and expenses, Social Security eligibility, and other information⁶ based on your financial status and future goals.

Information about our business planning fees can be found under “Business and Corporate Planning Fee” below in Item 5, “**Fees & Compensation**”.

General Consulting Services

We also offer **general consulting services**, which are independent of all other services. Under this arrangement, we do not provide any on-going investment management or financial planning services. Such consulting may include, but is not limited to:

- ❖ General and/or specific advice on non-managed investments
- ❖ General and/or specific financial planning advice
- ❖ Independent retirement plan benchmarking and cost analysis
- ❖ General and/or specific life insurance or annuity contract review and recommendations
- ❖ Real estate analysis
- ❖ General and/or specific divorce planning advice

For information on our fees for consulting services, see “General Consulting Fee” under Item 5, “**Fees & Compensation**.”

FEES & COMPENSATION

ITEM 5

Portfolio Management Fee

Portfolio management is provided on an **asset-based fee**⁷ arrangement. The management fee will be calculated based on the **aggregate fair market value** (including cash and cash equivalent securities) of your portfolio account(s) on the last business day of the previous calendar quarter **multiplied by one-fourth of the corresponding annual percentage rate for each portion of your portfolio assets that fall**

⁶ All information provided by and to you will be kept entirely confidential. Such information will be disclosed to third parties only with mutual written consent or as may be permitted by law.

⁷ An asset-based fee is a percentage fee charged based on your assets under management for our professional time giving continuous advice, managing investment strategies, and suggesting investment options. We receive no other compensation for this advisory service unless first disclosed to you.



within each tier – a blended fee (See “Billing” below under “Protocols for Portfolio Management” for formula calculation.). The tier breaks are as follows:

Account Value*	Annual Fee Rate Negotiable	Qualified Plan** Management Non-Negotiable	AllGen Crypto Altshield*** Non-Negotiable
First \$1,000,000	1.00%	0.50%	1.25%
Next \$1,000,000.....	0.90%	0.50%	1.25%
Next \$1,000,000.....	0.80%	0.50%	1.25%
Next \$1,000,000.....	0.70%	0.50%	1.25%
Next \$1,000,000.....	0.60%	0.50%	1.25%
Next \$5,000,000.....	0.50%	0.50%	1.25%
Next \$15,000,000.....	0.40%	0.50%	1.25%
Next \$25,000,000.....	0.30%	0.50%	1.25%
Next \$50,000,000.....	0.25%	0.50%	1.25%
Over \$100,000,000	0.20%	0.50%	1.25%

* The Account Value is the aggregate market value of your account assets maintained with our qualified custodian (See “Custodial Services” under Item 12, “Brokerage Practices”). Account values greater than \$250,000 are eligible for us to design a financial plan for no cost. This is an optional service available to you should you request it. See “Financial Planning Fee” below for additional information. Qualified Plan Management assets are not included with the account value total for us to develop a financial plan.

** Qualified Plan Management refer to retirement plans designed to meet ERISA guidelines (i.e., 401(k) and 403(b) plans, profit-sharing plans, and Keogh (HR-10) plans). Services include: (i) analyzing the available funds within the plan, (ii) create and implement an allocation based on your risk profile, and (iii) monitor and reallocate the portfolio as needed or as you deem necessary.

*** The AllGen Crypto AltShield Portfolio® is an **algorithm-based investment strategy** that utilizes FINIAT’s Intelligent Allocation model to gain exposure to cryptocurrency exchange-traded funds (ETFs). **For additional information, please see “AllGen Crypto AltShield Portfolio”** under the “Methods of Analysis, Investment Strategies & Risk of Loss” section in this Disclosure Brochure.

Except for the Qualified Plan Management and AllGen Crypto Altshield Portfolio strategies, we **may negotiate the management fee within each tier** based on the size and complexity of the portfolio managed. Keep in mind, for the portion of your portfolio that exceeds into the next tier level, either through additional deposits or asset growth, a fee break will occur.

A **minimum annual fee of \$500** (\$125 billed quarterly) will be billed to those accounts with portfolio values of **\$50,000 or less**, which **may be waived if one of the following are met**: (i) paying for, at minimum, an Individual financial plan (see “Financial Planning Fee” options below), or (ii) contributing \$500 monthly to your portfolio management account.

If neither waiver option is met, an account subject to the \$500 minimum annual fee will continue to pay a quarterly fixed fee of \$125 until such time as the account value exceeds \$50,000. Once this happens, the above fee schedule would be applied to the managed account. Keep in mind, **the further an account drops below \$50,000, the more expensive our management services become** (e.g., a managed account of \$10,000 with a minimum annual fee charge of \$500, will translate into an annual fee rate of 5.00%). If this were to happen to your account, you may want to consider other management firms with lower fees.

Protocols for Portfolio Management Services

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawals of funds; and (iv) other fees charged to your account(s).



Discretion

We will establish discretionary trading authority on all management accounts to execute securities transactions at any time without your prior consent or advice. However, you may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

Billing

Your account will be **billed quarterly in advance** based on the fair market value for the portion of your portfolio that **falls within each tier** of our fee schedule. As your portfolio value exceeds into the next tier level, either through additional deposits or asset growth, the amount of assets above the fee-break will be billed the corresponding annual fee rate. This results in a blended fee and **effectively lowers the annual fee costs** to manage your portfolio. An example of how the value of your portfolio lowers our management fee billed to your account:

Portfolio Account Value: \$9,000,000

Tier Fee-Breaks	Annual Fee % (Per Tier)	Tier Assets (Assets within each tier.)
First \$1,000,000	1.00%	\$1,000,000
Next \$1,000,000	0.90%	\$1,000,000
Next \$1,500,000	0.80%	\$1,500,000
Next \$1,500,000	0.70%	\$1,500,000
Over \$5,000,000	0.50%	\$4,000,000
Blended Annual Fee %	0.68334%	

For **new managed** accounts opened in mid-quarter, our fee will be based upon a **pro-rated calculation of your assets to be managed** for the current quarterly period.

Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

Deposits and Withdrawals

Assets deposited by you into your portfolio management account between billing cycles will **not** result in additional management fees being billed to your account **unless such deposits exceed \$25,000**. We do not want to discourage you from investing additional capital for your future, however deposits of this amount or greater, in most cases, will require modifications and adjustments to your investment allocation. Therefore, we reserve the right to bill your account a pro-rated fee based upon the number of days remaining in the current quarterly period for deposits exceeding the above amount.

We do not make partial refunds of our quarterly fee for withdrawals you make during a calendar quarter. Just as with deposits, withdrawals from your account will require modifications and adjustments to be made to correct the allocation of assets in your portfolio.

Fee Exclusions

The above fees for all our management services are exclusive of any charges imposed by the custodial firm including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, including, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term



redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services.

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: redemption fees, account fees, and purchase fees may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus. You will find additional information about our custodial arrangements under "Custodial Services" in Item 12, "Brokerage Practices."

Termination of Portfolio Management Services

To terminate portfolio management services, either party (you or us) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received **at least 30 days prior** to the date of termination (i.e.; To terminate services on October 1st, a request for termination should be received in our office by September 1st). Such notification should include the date the termination will go into effect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar quarter, you shall be entitled to a pro-rated refund of the prepaid quarterly management fee based upon the number of days remaining in the quarter after the termination notice goes into effect. Once the termination of investment advisory services has been implemented, neither party has any obligation to the other – we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

Financial Planning Fee

Our financial planning fee is structured based on the financial planning⁸ service you desire with payment structured under the following payment options:

Financial Planning Billing Options

Pricing	Annual Billing Option		Monthly Billing Option	
	Year 1	Following Years	Month 1	Following Months
Individual	\$1,500	\$1,100	\$500	\$100
Individual Pinnacle [^]	\$2,250	\$1,375	\$1,000	\$125
Family ^x	\$2,250	\$1,375	\$1,000	\$125
Family Pinnacle [^]	\$3,250	\$1,925	\$1,500	\$175

Definitions:

^x A "Family" is any Individual plus one or more natural persons.

[^] The "Pinnacle" service is an additional fee added to the base "Individual" or "Family" fee for more complicated issues that the average "Individual" or "Family" does not experience. This is an **automatic, non-negotiable fee** and is included for the following, but is not limited to: business/corporate planning, multiple investment property, divorce, children from previous marriages, etc. Such Pinnacle service fee will be discussed before service is implemented.

⁸ The recommendations made in a financial plan are generally completed within 60 to 90 days from you signing the Agreement. However, implementing the plan using outside professionals (i.e., attorneys, CPAs, etc...) may require additional time that is out of our control. Therefore, when we refer to the completion of the financial plan, we are referring to us (you and us) finalizing your financial benchmarks/objectives before approaching any outside professional.



Billing Options

Our financial planning services are the same regardless of the payment option you choose. The only difference between the options is **how the fee is paid**. You may choose either the **Annual Billing Option** or the **Monthly Billing Option**, as shown in the fee schedule above.

- ❖ Under the **Annual Billing Option**, the annual fee is divided into two equal payments. The first payment is due when the Financial Planning Agreement is signed and establishes your annual anniversary date. The second payment is due six months later. In each subsequent year, payments will continue to be billed every six months based on that anniversary date.
- ❖ The **Monthly Billing Option** is offered as a convenience and includes a small processing mark-up. As a result, the total cost of paying monthly is slightly higher than paying under the Annual Billing Option. The difference between the two billing options is \$100 for the Individual plan, \$125 for the Individual Pinnacle and Family plans, and \$175 for the Family Pinnacle plan.

Under the **Monthly Billing Option**, you will make an initial payment in the first month followed by recurring monthly payments beginning the following month. Monthly payments will continue until you terminate ongoing planning services.

Financial planning fees are **not negotiable**. However, financial planning fees are waived if we manage more than **\$250,000** of your investment portfolio.

Termination of Financial Planning Services

All fees and payment arrangements will be disclosed in your **Financial Planning Agreement**, which will also outline the process for gathering your financial information and preparing your financial plan.

You may terminate the Financial Planning Agreement at any time **before** your financial plan is presented. If the agreement is terminated before the plan is delivered, we will be compensated for the time spent preparing the plan at the hourly rate stated in the Agreement. Any prepaid but unearned fees will be refunded on a **pro-rata basis**.

Once the financial plan has been completed and presented to you, the first-year financial planning fee is considered earned. If you terminate the agreement at that time, you will remain responsible for the balance of the first-year planning fee.

Regardless of which billing option you select, if you terminate either billing arrangements during the first 12 months after the plan has been completed and presented to you, **you will be responsible for the remaining balance** of the first-year financial planning fee. After the first year, **ongoing financial planning services may be terminated at any time**, and any unearned fees will be refunded on a pro-rata basis.

Business and Corporate Planning Fee

Business and corporate planning services will be billed an initial engagement of **\$1,200** and a monthly fee billed at the beginning of each month based on the company's annual revenues. The monthly payment begins the second month after the business and corporate planning engagement (i.e. if the business and corporate planning engagement began in January, your monthly recurring payment will begin in March). The monthly fee is based on the following schedule:



Annual Revenue	Monthly Fee
Up to \$500,000	\$250
\$500,000 to \$2,500,000	\$350
Over \$2,500,000	\$500

Monthly payments will be due at the beginning of each month and will remain in effect until such time as you decide to terminate our planning process. If the Business and Corporate Planning Agreement is terminated during the development process, we will reimburse you for any un-earned fees.

Money Cent\$

Money Cent\$ is a youth educational seminar/workshop we offer high school students at a summer youth camp. This program is designed to develop critical lifelong financial skills (i.e., budgeting, investing, saving, debt, and giving). Activities include:

- ❖ Lessons for Dave Ramsey’s “Generation Change”
- ❖ Building a Budget
- ❖ Cash Flow Game from the author of “Rich Dad, Poor Dad”
- ❖ A personality test “What’s Your Style” – choosing a career path
- ❖ What do you want to be when you grow up – explores a dream job
- ❖ Learning the basis of investing
- ❖ The gift of giving
- ❖ Reality Store – a month in the life of an adult

The cost of the materials is currently \$75 per student. Fees may change since we have no control over the cost of the materials. Money Cent\$ is a weeklong camp going from 9am to 12pm Monday through Friday.

General Consulting Fee

General consulting is independent of our portfolio management and financial planning services. **Under this arrangement, we do not provide any on-going management of your account or give continuous investment advice.** We will perform the desired task, but **you are responsible** for implementing any of the advice, if any.

Our general consulting fee is a **negotiable hourly rate not to exceed \$250 per hour** for our advice. All consulting fees will be completely itemized in a billing statement or consulting agreement. For the initial consultation, the fee will be due at the end of the session. Thereafter we will bill you at the agreed upon hourly rate, should we be contacted by you for future reviews and advice.

General consulting services can be terminated at any time.

PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.



TYPES OF CLIENTS

ITEM 7

The types of clients we offer advisory services to are described above under “Who We Are” in the Item 4, the “**Advisory Business**” section. We do not require a minimum account value to open a portfolio management account.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

ITEM 8

Our portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy. Your portfolio is then tailored to these unique investment parameters using primarily Exchange Traded Funds (“ETFs”) with the occasional mix of equity (“stock”) positions, debt instruments (bonds), investment company (“mutual fund”) products.

Methods of Analysis

In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gather information and to guide us in our management decisions.

Fundamental Analysis

Fundamental analysis is a method of analyzing the intrinsic value of a financial asset, such as a stock or bond, by examining its underlying economic and financial factors. It involves analyzing a company's financial statement and ratios to determine its financial health and growth prospects. The goal of fundamental analysis is to determine whether the current market price of an asset is undervalued, fairly valued, or overvalued.

RISKS – Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the marketplace. Investing in companies with sound financial data/strength and a history of healthy returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

Quantitative Analysis

Quantitative analysis uses mathematical and statistical models to analyze financial markets and assets. It involves using many data points, such as historical prices, trading volume, and other financial metrics, to identify patterns and trends. This information is used to make investment decisions based on statistical probabilities and risk management principles.

RISKS – The key benefit of quantitative analysis is its ability to reduce complex figures to a single piece of data that is easy to grasp, discuss, and support decision-making and investment recommendations. However, quantitative analysis relies on mathematical models and historical data, which may not always be a reliable indicator of future performance and real-world conditions.



Technical Analysis

Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

RISKS – Technical analysis is charting the historical market data of a stock, taking into consideration current market conditions, to forecast the direction of a future stock price rather than using fundamental tools for evaluating a company's financial strength. Technical analysis focuses on the price movement of a security trading in the marketplace. This is an ideal tool for short-term investing to identify ideal market entry/exit points. However, no market indicator is absolutely reliable, and your investment portfolio can underperform in the short-term should the market indicators be incorrect.

Cyclical Analysis

Cyclical analysis uses cyclical patterns and economic data to predict economic trends and market movements. It is based on the theory that economic activity follows a predictable expansion and contraction pattern known as the business cycle. We can predict economic growth and market trends by identifying where the economy is in the business cycle.

RISKS – Cyclical data reveals regular intervals of repeated events that can be forecasted into the future to time the market on when to buy/sell a security. The risk with cyclical analysis is attempting to buy/sell a security based on a future price prediction and missing beneficial movements in price due to an error in timing. This causes harm to the value of the security being bought too high or sold too low.

Behavioral Economics and Market Psychology

In addition to the above analysis techniques, we consider behavioral economics and market psychology in our investment and trading decisions. Large groups of investors may act irrationally for periods of time (the herd mentality), and we seek to exploit the mispricing of equities that this may cause. Social media is now a significant factor in the movement of stocks, and we seek to find ways to trade and invest around the volatility that it creates.

RISKS – Attempting to predict rational and/or irrational investment tendencies with social media groups is risky due to their whimsical nature not based on any guiding investing principles. This strategy is usually very short-term due to the extreme tendencies of the group but is a great tool to trade securities with good fundamentals that have been affected by the herd mentality.

Fundamental analysis provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while **quantitative analysis** assists us with portfolio optimization techniques. **Technical analysis** is short-term focusing on the statistics generated by market activity, **behavioral economics** is also short-term but mostly focuses on social trends and the political, societal mood for the day and, **cyclical analysis** provides us with historical data on market trends to focus our technical/behavioral analysis for optimal entry/exit points.

Investment Strategies

We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. We understand markets and **money made** from increased stock values has greater risk



(volatility) than **money earned** from dividends (secure and stable) in income-oriented securities. Our goal is to balance making and earning money by maintaining a disciplined management approach, regardless of the strategy, so as to not sacrifice long-term goals for short-term gains.

Asset Allocation Strategy

Asset allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. From this we may use more narrow and aggressive asset allocation derivatives.

Other features of our asset allocation strategies can utilize these portfolio-modeling structures for analyzing various possible portfolio groupings of securities.

Modern Portfolio Theory

Modern Portfolio Theory (“MPT”)⁹ is the analysis of a portfolio of stocks as opposed to selecting stocks based on their unique investment opportunity. The objectives of MPT is to determine your preferred level of risk and then construct a portfolio that seeks to maximize your expected return for that given level of risk.

Post-Modern Portfolio Theory

Post-Modern Portfolio Theory (“PMPT”)¹⁰ is a portfolio optimization methodology that uses the downside risk of returns instead of the mean variance of investment returns used by MPT. Both theories describe how risky assets should be valued, and how you should utilize diversification to achieve portfolio optimization. The difference lies in each theory's definition of risk, and how that risk influences expected returns.

Core-Satellite Approach

Core-Satellite is an investment strategy that blends a static (passive) and dynamic (active) investment management style to achieve more consistent tracking to asset class benchmarks. The objective behind the core-satellite approach is that most of the portfolio will be dedicated to matching its benchmark with low risk, while a smaller allocation will target enhanced returns so that, when the two elements are combined, the portfolio is potentially able to beat its benchmark in a risk-controlled manner.

Core Portfolio

The bulk of the portfolio (the core) is a static management style made up of an asset allocation mix where capital is efficiently allocated to those assets that match the rate of return and acceptable risk tolerance level desired by the client.

Satellite Portfolio

The satellite portion of the portfolio is a dynamic management style that aims for higher returns by rebalancing the percentage of asset mix held in the satellite portion of the client’s account in order to take advantage of short-term market pricing anomalies or strong market sectors. This is referred to as Tactical Asset Allocation.

⁹ The “Portfolio Theory” was developed and introduced by Harry M. Markowitz in his paper “Portfolio Selection” published in 1952 by the *Journal of Finance* while he was working on his PhD doctoral thesis at the University of Chicago. Mr. Markowitz further refined his theory during the latter part of the 1950’s and on into the 70’s. Along the way, his theory became known as the “Modern Portfolio Theory”. Mr. Markowitz won the Nobel Memorial Prize in Economic Sciences in 1990 as a co-laureate along with William Sharpe.

¹⁰ PMPT was conceived in 1991 when software designers Brian M. Rom and Kathleen Ferguson perceived there to be significant flaws and limitations with software based on MPT and sought to differentiate the portfolio construction software developed by their company, Investment Technologies. The theory uses the standard deviation of negative returns as the measure of risk, while MPT uses the standard deviation of all returns as a measure of risk



Strategic Allocation Modeling

Strategic asset allocation is a strategy that involves setting target allocations for various asset classes, then periodically rebalancing the portfolio back to the original allocations when target allocations deviate significantly from the initial setting due to differing returns from various assets.

Sharpe Ratio Model

Sharpe Ratio¹¹ is a risk-adjusted measure of return often used to evaluate the performance of a portfolio. The Sharpe Ratio is the average return earned in excess of the risk-free rate per unit of volatility.

Active Money Management

Active money management is the use of a human element to actively manage a portfolio. It is a strategy that does not follow the efficient market hypothesis but believes it is possible to profit from the stock market through any number of strategies that aim to identify mispriced securities. Active managers rely on analytical research, forecasts, and their own judgment and experience in making investment decisions on what securities to buy, hold and sell. The opposite of active management is called passive management, better known as "indexing".

The objective with active management is to produce better returns than those of passively managed index funds. This strategy attempts to anticipate market movements, which may entail being defensive and holding higher levels of cash or other safe haven securities if a weaker market is anticipated. In contrast, an attempt would be made to become more opportunistic if a stronger market is anticipated. An actively managed portfolio may not attempt to be diversified but rather may focus on areas of the market that price appreciation is anticipated while attempting to avoid weaker areas of the market.

AllGen Crypto AltShield Portfolio®

The AllGen Crypto AltShield Portfolio® is an algorithm-based investment strategy that provides exposure to cryptocurrency exchange-traded funds (ETFs). The strategy also allocates to more traditional assets in an effort to reduce overall portfolio volatility.

The strategy uses a rules-based allocation process. Allocation decisions are driven by a third-party quantitative model and not by discretionary market timing.

Investment Objective

The strategy seeks to participate in cryptocurrency market gains while attempting to reduce downside risk by reallocating among digital asset ETFs, fixed income ETFs, gold ETFs, and cash or cash equivalents. **There is no guarantee that the strategy will be successful or that losses will be avoided.**

Investment Methodology

The portfolio uses the FINIAT Intelligent Allocation Algorithm¹², a third-party model that adjusts asset allocations based on predefined rules. The model evaluates factors such as:

- ❖ Market volatility
- ❖ Price trends and momentum

¹¹ Nobel laureate and economist William F. Sharpe developed the Sharpe Ratio.

¹² FINIAT's Intelligent Allocation is an **quantitative portfolio management model** that uses data-based analysis to adjust asset allocations in response to changing market conditions. **We do not control the underlying methodology, assumptions, or operation of this third-party model.**



- ❖ Correlations among asset classes
- ❖ Changing market conditions

The model may increase or decrease exposure to cryptocurrency ETFs or defensive assets based on its signals. The strategy may move partially or entirely into defensive positions. Model-driven strategies are subject to limitations. The algorithm may not perform as intended and may underperform the market or other strategies.

Portfolio Investments

The strategy may invest in the following ETFs, with allocations ranging from 0% to 100% of portfolio assets, except as noted:

- ❖ Grayscale Bitcoin Mini Trust ETF (BTC): 0–100%
- ❖ Grayscale Ethereum Mini Trust ETF (ETH): 0–50%
- ❖ iShares Treasury Floating Rate Bond ETF (TFLO): 0–100%
- ❖ iShares Gold Trust (IAU): 0–100%
- ❖ SPDR Bloomberg 1–3 Month T-Bill ETF (BIL) or other cash equivalents: 0–100%

Allocations may change at any time without notice. We may add, remove, or substitute investment positions or adjust allocation ranges at our discretion, consistent with the strategy's objective.

Principal Risks

This strategy involves significant risk and is not appropriate for all investors. Material risks include:

- ❖ **Loss of Principal:** You can lose some or all of your investment.
- ❖ **Cryptocurrency Risk:** Cryptocurrency-related investments are highly volatile and speculative. Prices can decline significantly in short periods.
- ❖ **Model Risk:** The strategy relies on a quantitative model. If the model's assumptions or signals are incorrect, performance may be adversely affected.
- ❖ **Concentration Risk:** The portfolio may hold substantial exposure to cryptocurrency-related ETFs.
- ❖ **Liquidity Risk:** During stressed market conditions, certain holdings may be difficult to sell at desired prices.
- ❖ **Regulatory Risk:** Changes in laws or regulations affecting digital assets may negatively impact the strategy.
- ❖ **Tax Risk:** Frequent reallocation may result in short-term capital gains, which are generally taxed at higher rates.

Important Information

This strategy involves substantial volatility and risk of loss. It invests in speculative assets and uses an algorithmic allocation process. It is not suitable for investors who cannot tolerate significant fluctuations in account value. **You should carefully consider your financial situation, objectives, and risk tolerance before investing.**

Managing Risk

The primary risk associated with any investment strategy is the risk that the value of your portfolio will decline due to changes in market conditions. This is commonly referred to as market risk, or volatility risk, and reflects the variability of investment returns. In addition to market risk, other important risk factors include:



- ❖ **Interest Rate Risk** – Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** – Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** – Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in international securities can be affected by changes in exchange rates.
- ❖ **Liquidity Risk** – A financial risk where a company is unable to meet short-term financial obligations without selling either hard-assets or finding another way to reduce the discrepancy between cash flow and debt obligations.
- ❖ **Inflation Risk** – The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** – Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors described above are not intended to be a complete list of all possible risks, but rather those most commonly associated with your portfolio. Other risks may include political or legislative changes, over-concentration in certain asset classes or sectors, and other unforeseen events.

Regardless of the methods we use to analyze securities or the strategies we employ in managing your portfolio, **all investments involve the risk of loss. You should be prepared to bear that risk. In addition, past performance is not a guarantee of future results, and you may experience losses.**

DISCIPLINARY INFORMATION

ITEM 9

We have no legal or disciplinary events to report.

OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

ITEM 10

Independent Insurance Agents

Certain of our management persons and Investment Advisor Representatives (“RA”) are also licensed as resident life, health, and fixed annuity insurance agents by the State of Florida and may be licensed as non-resident agents in other states. These agents are licensed to sell insurance-related products and earn commissions from the sale of those products.

As agents, these RAs are licensed to sell insurance-related products and earn commissions from the sale of these products. Potential conflicts of interest can occur when an RA, as a trusted advisory advising your portfolio for a fee, recommends you purchase an insurance product in which he/she will earn a commission. This can create a situation of divided loyalty and the objectivity of the advice rendered could be subjective and create a disadvantage to you.

For further information on potential conflicts and economic benefits from these activities by RAs who hold the above licenses, see “Financial Planning Compensation” below under Item 14, “**Client Referrals & Other Compensation**” of this Brochure. In addition, more information about our RA who offer investment advice and their insurance activities can be found in their individual “**Brochure Supplements**”.



CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

Code of Ethics

As a fiduciary, AllGen has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

Client Transactions

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

Participation or Interest

It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by Mr. Paul Roldan, and such investment is not in violation of any SEC and/or State rules and regulations.

Class Action Policy

AllGen, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.

Personal Trading

Employees are allowed to invest their own money in securities, including securities that may also be recommended to you. In most cases, personal trades are made independently of client trading. However, there may be times when an employee buys or sells the same security at or near the time we trade for clients. Because this could create a conflict of interest, we follow strict guidelines to protect you



1. Employees with discretion over client accounts may not trade for themselves based on non-public or employment-derived information. Client interests always come first.
2. Our Chief Compliance Officer regularly reviews personal holdings and trading activity of access employees.
3. All employees must follow applicable federal and state advisory regulations.
4. If employee accounts are included in aggregated (“bunched”) orders, client orders receive priority and are filled first.
5. Violations of these rules may result in disciplinary action, including termination.

Personal trading is monitored to ensure it does not disadvantage clients or compromise our fiduciary duty.

BROKERAGE PRACTICES

ITEM 12

Custodial Services

The Company has established custodial relationships with the following financial institutions:

- ❖ **Charles Schwab & Company, Inc. (“Schwab”)** – Schwab is a registered broker-dealer (member FINRA/SIPC), offering custodial services through their division Schwab Advisor Services for financial advisors.
- ❖ **Altruist Financial, LLC (“Altruist”)** – Altruist is a registered broker-dealer (member FINRA/SIPC), offering custodial services through the Altruist Platform to investment advisors.

Both Schwab and Altruist offer us services, which include custody of securities, trade execution, clearance and settlement of transactions.

While we do not have a soft-dollar arrangement with either institution, we do receive certain economic and administrative benefits from both that are not typically available to retail clients. **These benefits create a potential conflict of interest because they provide an incentive for us to recommend them as custodian.** The benefits we receive include, but are not limited to:

- ❖ Access to electronic systems for order entry, account information, and reporting.
- ❖ Receipt of duplicate client statements and trade confirmations.
- ❖ Access to trading and operational support services, including a dedicated trading desk.
- ❖ Access to batch trading capabilities for the aggregation and allocation of transactions.
- ❖ The ability to have advisory fees deducted directly from client accounts.
- ❖ Access to educational, practice management, and consulting resources.

These benefits are not paid for with client commissions and do not constitute soft-dollar arrangements.

We are **not affiliated with Schwab, and Schwab does not supervise or direct the investment advice we provide.** We retain sole responsibility for the investment advice rendered to clients.

Direction of Transactions and Best Execution

As a fiduciary, we seek to obtain best execution for your transactions. In evaluating best execution, we consider factors such as execution capability, transaction costs, financial strength, responsiveness, and the overall quality of services provided.



The custodial support services and benefits we receive from Schwab and Altruist create a potential conflict of interest because they provide us with an incentive to recommend these institutions as custodian for your account. We address this conflict by periodically evaluating Schwab's and Altruist's services and pricing and determining that their overall services remain reasonable and appropriate for you and our other clients.

We generally recommend Schwab or Altruist as custodian and do not routinely offer you a selection of alternative custodians. You are not required to use Schwab or Altruist and may select a different custodian. However, if you choose another custodian, it may limit our ability to provide certain services and may result in additional costs or operational differences that could affect your account.

Aggregating Trade Orders

When we place trades, our goal is to treat clients fairly and to seek the best possible outcome for everyone (this is called "best execution"). To help do that, we often combine similar client orders into one larger "block" trade and then allocate the shares to each account. We generally do this only when (i) combining orders is expected to improve execution, and (ii) no client is consistently helped or hurt by the practice.

Before we aggregate orders, we consider several factors, including:

- ❖ **Trading volume of the security.** In heavily traded markets, block trades can help clients receive the same price and timing, rather than being filled at different prices throughout the day.
- ❖ **Number of client accounts involved.** If only a small number of accounts are participating, placing separate orders may be more efficient or may result in better execution than aggregating them.
- ❖ **Type of investment and order complexity.** Certain securities and more complex orders may be better handled individually to achieve the best execution.

This approach is intended to improve fairness, consistency, and overall execution quality for our clients.

REVIEW OF ACCOUNTS

ITEM 13

Portfolio Management Reviews

Your investment strategies and investments are monitored by Paul Roldan and reviewed on an on-going basis by the Investment Advisor Representative ("IAR") managing your account. The general economy, market conditions, and/or changes in tax law can trigger more frequent reviews. Cash needs will be adjusted as necessary. Material changes in your personal/financial situation and/or investment objectives will require additional review and evaluation for us to properly advise you on revisions to previous recommendations and/or services. However, it is **your responsibility to communicate these changes** for us to make the appropriate corrections to your management account(s).

You will receive statements, at least quarterly, from Schwab and/or Altruist where your account(s) are held in custody that identifies your current investment holdings, the cost of each of those investments, and their current market values.

You are encouraged to review the trading activities disclosed on your account statements from these institutions, which summarizes your portfolio account value, current holdings, and all account



transactions made during the quarter. **It is important for you to review these documents for accurate reporting and to determine whether we are meeting your investment expectations.**

Financial Planning Reviews

The financial planner who has/is designing your financial plan will work closely with you to be sure the action points identified in the financial plan have been or are being properly executed. Once the action points have been completed, the financial plan should be reviewed at least annually. Material changes in your lifestyle choices, personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made.

Business and Corporate Planning Reviews

The financial planner who has/is developing the business plan will work closely with the company's management team to be sure the action points identified meet the company's present and future goals as set out in a strategic plan or other such document. Once the desired service has been completed for the business, the management team may want to contact the financial planner over the strategic plan for follow-up reviews in the future.

CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

Referral Compensation

We may directly compensate persons/firms for client referrals, provided that those persons are qualified and have agreed to act as a Promoter under our Referral Partner Agreement. Under such arrangements, if you were referred to us by a Promoter, the Promoter will provide complete information on our relationship and the compensation that the Promoter will receive should you choose to open an account. In no case will the fee that you pay be higher than it would be if you had dealt directly with us. In addition, we will adhere to each State's rules and regulations where the Promoter resides prior to entering into any Referral Partner Agreement with that person/firm.

Other Compensation (Indirect Benefit)

AllGen may receive an indirect economic benefit from Schwab in the form of support products and services they make available to us (See "Custodial Services" above under Item 12, "Brokerage Practices" for more detailed information on these products and service, how they benefit us, and the related conflicts of interest.).

Financial Planning Compensation

As previously mentioned, certain of our Investment Advisor Representatives ("RAs") are **commissioned insurance agents** (See "Insurance Company Activities & Affiliations" above in Item 10, "Other Financial Industry Activities & Affiliations" for more information.). This can create a conflict of interest when recommending for a fee, through a financial plan, that you purchase insurance products where a commission can also be earned.

In addition, there are also potential conflicts of interest when an RA suggests the need for outside consultations and professional services (i.e., attorneys, accountants, brokers, etc.) to implement certain



aspects of a financial plan. Even though the RA does not receive any share of fees earned by the outside professionals when implementing a financial plan, it does create an incentive on his/her part to refer your business to only those entities that in turn refer potential clients to us.

In both cases, there is potential for divided loyalty and the objectivity of the advice rendered could be subjective and create a disadvantage to you. Therefore, to ensure you understand the choices and risks you have in receiving financial planning along with all other investment recommendations, the following disclosures are provided to assist you with your decisions:

- ❖ Certain aspects of a financial plan may require the assistance of a Registered Representative of a broker-dealer to execute a transaction. In this situation regardless of who performs the transaction(s), **such person will be entitled to earn a commission or fee.**
- ❖ If requested by you to implement any insurance recommendations made in the financial plan, the RA will execute such transactions through those insurance companies in which he/she is a licensed insurance agent. In such cases, **the RA will receive the normal commissions associated with such insurance transactions.**
- ❖ You are under no obligation to have any related parties that we recommend prepare planning documents (i.e.; financial, estate, tax, etc...). **You are free to choose those outside professionals to implement the recommendations made in the financial or estate plan.**
- ❖ AllGen does not receive any economic benefit from referring you to another professional without first notifying you of such possibilities.

Notwithstanding these disclosures, other conflicts of interest may arise from time-to-time. In such cases, we will make every effort to fully disclose any issues prior to engagement. We strive, at all times, **to serve your best interest and ensure proper disclosure** is being made to you in compliance with the Investment Adviser Act of 1940, Rule 275.206.

Retirement Rollover Compensation

Earning a management fee from recommending the rollover of retirement plan assets to an IRA we manage is considered “self-dealing” and prohibited unless we comply with the Prohibited Transaction Exemption (“PTE”) 2020-02, “Improving Investment Advice for Workers & Retirees” exemption issued by the Department of Labor. The DOL considers earning a management fee “self-dealing” because it increases our compensation and profits while potentially disregarding the underlying costs paid by, and the services provided under, the retirement plan that might be more beneficial to you should your retirement assets remain with the plan. Therefore, when it comes to your retirement assets, there are typically four options you should consider when leaving an employer:

- ❖ Leave the account assets in the former employer’s plan, if permitted.
- ❖ Rollover the assets to the new employer’s plan if one is available and rollovers are permitted.
- ❖ Rollover the account assets to an Individual Retirement Account (an “IRA”); or,
- ❖ Cash out the retirement account assets (There may be tax consequences and/or IRS penalties depending on your age.).

Should you approach us to advise you on which option would be the best for your situation, we have an economic incentive to recommend you rollover your retirement account to a managed IRA account with us where we would earn a management fee on the assets. This can create a conflict of interest and the objectivity of the advice we render subjective and a disadvantage to you. Therefore, if we recommend you rollover your retirement account to an individually managed IRA account, you are under no obligation to engage us to manage your assets. You are free to take your account anywhere.



CUSTODY

ITEM 15

Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities shall be maintained with Schwab and/or Altruist as indicated above in Item 12, “**Brokerage Practices**”.

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. Therefore, to comply with the United States Securities and Exchange Commission’s Custody Rule (1940 Act Rule 206(4)-2) requirements, and to protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ Your funds and securities will be maintained with a qualified custodian (Schwab and/or Altruist) in a separate account in your name.
- ❖ Authorization to withdrawal our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.

Schwab and Altruist are required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from Schwab and/or Altruist to verify the accuracy and correctness of our reporting.**

Standing Letters of Authorization

We will allow you to maintain a Standing Letter of Authorization (“SLOA”) with our firm. However, SLOAs with asset transfer **instructions to a third-party** (e.g., any person/entity/joint account other than just you alone) define us as having custody under the Custody Rule (1940 Act Rule 206(4)-2). Therefore, to comply with the No-Action Letter issued by the SEC, relating to SLOAs and the Custody Rule, we have implemented the following regulatory safeguards and will only accept SLOAs under these conditions:

- ❖ The person and place of delivery must always be identified in the SLOA instructions. We will not approve any SLOAs where we are authorized to modify the instructions relating to the person and/or place of delivery.
- ❖ We will not accept SLOA instructions for delivery to a person affiliated with our firm and/or located at our place of business.
- ❖ The timing and amount of assets to transfer can be open-ended per the instructions of the SLOA.
- ❖ All SLOA instructions must be in writing and confirmed with your signature. We will not accept verbal changes to any SLOAs.

The SEC SLOA No-Action Letter identifies seven (7) steps to follow as part of the safekeeping requirements. The first two bullet-points above are our responsibility under the No-action Letter, the remaining five (5) are the responsibility of the qualified custodian (Schwab and/or Altruist). If you would like a complete list of the safekeeping instructions, let us know and we will be glad to provide you a copy.



INVESTMENT DISCRETION

ITEM 16

We have you complete our Investment Advisory Agreement which sets forth our authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

VOTING CLIENT SECURITIES

ITEM 17

We do not vote client proxies. You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in your managed accounts. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand, or you want clarification, you may contact us, and we will explain the particulars. Keep in mind we will not advise you in a direction to vote, that ultimate decision will be left to you.

FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$1,200.

We are not aware of any financial conditions that are likely to impair our ability to meet our contractual commitments to you.

END OF DISCLOSURE BROCHURE

FORM ADV: PART 2B

BROCHURE SUPPLEMENT



AllGen Financial Advisors, Inc.

100 W. Lucerne Circle, Suite 200
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Toll: 888.6ALLGEN (625-5436)
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Fax: 407.210.3887

advisors@allgenfinancial.com
www.allgenfinancial.com

SUPERVISION

Paul Roldan

Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan oversees the regulatory compliance of our advisory practice, ensuring that all business activities adhere to federal and state regulations.

His additional responsibilities include, but are not limited to, supervising investment activities, preparing planning documents, performing client consultations to evaluate and discuss investment options.

Paola A. Rojas, Director of Operations, provides ongoing supervision of Mr. Roldan's investment activities to ensure your best interests remain a priority. You can reach Ms. Rojas at 407.210.3888, or by email at rojas@allgenfinancial.com, with any questions or concerns.

BROCHURE SUPPLEMENT
DATED

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JANUARY
2026

This Brochure Supplement provides information about Paul Roldan that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Roldan, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Paul Roldan are also available on the SEC's website at www.adviserinfo.sec.gov.

Paul Roldan

CRD#: 2682260

Year of Birth: 1970

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1992 – Princeton University: Bachelor of Arts in Music

1994 - Harvard University: Masters in Public Policy

Licenses

FINRA Exams: Series 7 – General Securities Representative (Retired)

Series 24 – General Securities Principal (Retired)

Series 63 – Uniform Securities Agent State Law Examination (Retired)

Series 65 – Uniform Investment Advisor Law Examination (Active)

Business Background

09/2006 – Present AllGen Financial Advisors, Inc.

Position: Senior Partner, CEO & Chief Compliance Officer

04/2009 – 12/2009 QA3 Financial Corp.

Position: Registered Representative

10/2004 – 09/2006 Paul Roldan & Associates, Inc.

Position: President

09/2004 – 04/2007 Investment Mortgage International

Position: Loan Representative

05/2003 – 04/2007 Raymond James Financial Services, Inc.

Position: Principal & Financial Advisor

11/2001 – 10/2004 Heritage Financial Services, LLC

Position: President

DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

Mr. Roldan is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Roldan does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or amount of sales, client referrals, or from opening new accounts.



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SUPERVISION

Paul Roldan
Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

1
JANUARY
2026

This Brochure Supplement provides information about Jason C. Martin that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Martin, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Jason C. Martin are also available on the SEC's website at www.adviserinfo.sec.gov.

Jason C. Martin, CFP[®], CMT

CRD#: 3259475

Year of Birth: 1976

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1999 – University of Central Florida: Bachelor of Arts in Business Administration

Licenses

FINRA Exams: Series 7 – General Securities Representative (Retired)
Series 63 – Uniform Securities Agent State Law Examination (Retired)
Series 65 – Uniform Investment Advisor Law Examination (Active)

Designations: **CERTIFIED FINANCIAL PLANNER™ (CFP[®]) Certification¹** – The CFP[®] designation is issued by the Certified Financial Planner Board of Standards, Inc. The CFP[®] requires certificate holders to have a bachelor's degree, three (3) years professional working experience in the area of financial planning, and to successfully pass the examination process. To retain their CFP[®] designation certificate holders are required to pay any annual certification fee, complete 30-hours of continuing education every two (2) years, and adhere to the CFP[®] Board's Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards.

Chartered Market Technician – The CMT designation is awarded by the Market Technicians Association (MTA), Inc. to candidates who demonstrate proficiency in a broad range of technical analysis subjects. To earn the CMT designation requires one to meet education, examination, experience, ethics standards, and pay an ongoing certification fee. In addition, CMTs are required to meet rigid standards and annual continuing education requirements.

Business Background

04/2007 – Present AllGen Financial Advisors, Inc.
Position: Senior Partner & Chief Investment Officer

03/2003 – 04/2007 Good Risk Reward, Inc.
Position: President & Chief Compliance Officer

06/1999 – 12/2002 Charles Schwab & Co., Inc.
Position: Investment Consultant

06/1998 – 06/1999 Central Florida Investments, Inc.
Position: Marketing Coordinator

DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

Mr. Martin is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Martin does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or amount of sales, client referrals, or from opening new accounts.

¹ Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP[®], CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.



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SUPERVISION

Paul Roldan

Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

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JANUARY
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This Brochure Supplement provides information about Kathryn M. Hite that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Ms. Hite, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Kathryn M. Hite are also available on the SEC's website at www.adviserinfo.sec.gov.

Kathryn M. Hite

CRD#: 4958140

Year of Birth: 1963

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1985 – Transylvania University: Bachelor of Arts in Computer Science/Accounting

Licenses

FINRA Exams: Series 6 – Investment Company and Variable Contracts Product Rep. (Retired)
Series 63 – Uniform Securities Agent State Law Examination (Retired)
Series 65 – Uniform Investment Advisor Law Examination (Active)

Insurance: Florida Life, Health & Variable Annuity License

Business Background

05/2009 – Present AllGen Financial Advisors, Inc.
Position: Financial Advisor

03/2005 – 03/2009 PFS Investments, Inc.
Position: Financial Advisor

03/2004 – 03/2009 Primerica Financial Services
Position: Insurance Agent

DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

Licensed Insurance Agent

Ms. Hite is a licensed independent insurance agent. She will receive the normal commissions associated with insurance sales. This creates an incentive for her to recommend, should you inquire, those products in which she will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage.

You are under no obligation to accept Ms. Hite's recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "Client Referrals & Other Compensation". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Adviser Act of 1940, Rule 275.206.

ADDITIONAL COMPENSATION

Ms. Hite does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or amount of sales, client referrals, or from opening new accounts.



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SUPERVISION

Paul Roldan
Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
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This Brochure Supplement provides information about Ana N. Fernandez that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Ms. Fernandez, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Ana N. Fernandez are also available on the SEC's website at www.adviserinfo.sec.gov.

Ana N. Fernandez, CFP®

CRD#: 3190191

Year of Birth: 1966

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1988 – Wesleyan College: Bachelor of Fine Arts

Licenses

FINRA Exams: Series 6 – Investment Company and Variable Contracts Products Rep. (Retired)
Series 7 – General Securities Representative (Retired)
Series 63 – Uniform Securities Agent State Law Examination (Retired)
Series 65 – Uniform Investment Advisor Law Examination (Active)

Designations: **CERTIFIED FINANCIAL PLANNER™ (CFP®) Certification¹** – The CFP® designation is issued by the Certified Financial Planner Board of Standards, Inc. The CFP® requires certificate holders to have a bachelor's degree, three (3) years professional working experience in the area of financial planning, and to successfully pass the examination process. To retain their CFP® designation certificate holders are required to pay any annual certification fee, complete 30-hours of continuing education every two (2) years, and adhere to the CFP® Board's Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards.

Business Background

12/2010 – Present AllGen Financial Advisors, Inc.
Position: CFP® Practitioner & Wealth Strategist

05/2002 – 11/2010 Heritage Financial Services, LLC
Position: CFP® Practitioner & Wealth Strategist

05/1999 – 04/2002 AXA Equitable Life Insurance Company
Position: Registered Representative

DISCIPLINARY INFORMATION

Ms. Fernandez has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Ms. Fernandez is not involved in any other business activities that would require disclosure in this Brochure Supplement. Full focus of her attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Ms. Fernandez does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or amount of sales, client referrals, or from opening new accounts.

¹ Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.

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e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

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**JANUARY
2026**

This Brochure Supplement provides information about Robert J. Cortes that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Cortes, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Robert J. Cortes are also available on the SEC's website at www.adviserinfo.sec.gov.

Robert J. Cortes

CRD#: 5633547

Year of Birth: 1982

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2004 – Eastern Florida State College: Associates of Arts

Licenses

FINRA Exams: Series 7 – General Securities Representative Examination (Inactive)
Series 66 – Uniform Combined State Law Examination (Active)

Insurance: Florida Life, Health & Variable Annuity License

Business Background

05/2017 – Present AllGen Financial Advisors, Inc.
Position: Financial Advisor

01/2015 – 05/2017 Fairwinds Credit Union
Position: Vice President Retirement Planning

01/2015 – 05/2017 CUSO Financial Services, LP
Position: Registered Representative

07/2004 – 01/2015 Space Coast Credit Union
Position: Financial Advisor

12/2009 – 12/2014 LPL Financial, LLC
Position: Registered Representative

DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

Licensed Insurance Agent

Mr. Cortes is a licensed independent insurance agent. He will receive the normal commissions associated with insurance sales. This creates an incentive for him to recommend, should you inquire, those products in which he will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage.

You are under no obligation to accept Mr. Cortes' recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "Client Referrals & Other Compensation". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Adviser Act of 1940, Rule 275.206.

ADDITIONAL COMPENSATION

Mr. Cortes does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or amount of sales, client referrals, or from opening new accounts.



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SUPERVISION

Paul Roldan
Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

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**JANUARY
2026**

This Brochure Supplement provides information about Karen P Vergara that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Ms. Vergara, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Karen P Vergara are also available on the SEC's website at www.adviserinfo.sec.gov.

Karen P. Vergara, CPA®

CRD#: 6973361

Year of Birth: 1989

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2012 – University of Central Florida: Bachelor of Science in Accounting
Graduated Cum Laude

Licenses

FINRA Exams: Series 65 – Uniform Investment Advisor Law Examination (Active)

Insurance: Florida Life, Health & Variable Annuity License (Retired)

Designations: **Certified Public Accountant (CPA)** – Licensed in Florida. CPAs are licensed and regulated by their state boards of accountancy. State laws and regulations vary, but generally, licensure as a CPA include at minimum: a college education with degree in accounting, minimum experience levels (at least one year of experience in accounting), and successful passage of the Uniform CPA Examination. Additionally, CPAs are generally required to complete 80 hours of continuing education every two (2) years administered by the Florida Board of Accountancy and are required to follow a rigorous Code of Professional Conduct.

Business Background

06/2017 – Present AllGen Financial Advisors, Inc.

Position: Financial Advisor

01/2017 – 12/2017 Karen Vergara, P.A.

Position: Certified Public Accountant & Business Consultant

10/2015 – 12/2016 HBIF of Florida

Position: Business Development Consultant

01/2014 – 10/2015 Deloitte and Touche, LLP

Position: Auditor

06/2012 – 12/2013 Mia Thomas, P.A.

Position: Accounting Associate

DISCIPLINARY INFORMATION

Ms. Vergara has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Ms. Vergara is not involved in any other business activities. Full focus of her attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Ms. Vergara does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or dollar amount of sales, client referrals, or from opening new accounts



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SUPERVISION

Paul Roldan
Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

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JANUARY
2026

This Brochure Supplement provides information about Paul A. Mazon that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Mazon, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Paul A. Mazon are also available on the SEC's website at www.adviserinfo.sec.gov.

Paul A. Mazon

CRD#: 7318535

Year of Birth: 1968

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1995 – Washington State University: Bachelor of Arts
2001 – University of Phenix: Master of Business Administration

Licenses

FINRA Exams: Series 65 – Uniform Investment Adviser Law Examination

Business Background

11/2020 – Present AllGen Financial Advisors, Inc.
Position: Investment Advisor Representative
07/2007 – 06/2020 CHEP (U.S.A.), Inc.
Position: Manager, Demand Generation

DISCIPLINARY INFORMATION

There are no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

Mr. Mazon is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Mazon does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or dollar amount of sales, client referrals, or from opening new accounts.



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SUPERVISION

Paul Roldan

Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

1
JANUARY
2026

This Brochure Supplement provides information about Axel J. Otero that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Otero, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Axel J. Otero are also available on the SEC's website at www.adviserinfo.sec.gov.

Axel J. Otero

CRD#: 5233716

Year of Birth: 1979

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2002 – Universidad de Puerto Rico, Cayey: Bachelor's Degree in Business Administration
2005 – Interamerican University of PR: Master of Business Administration focus in Finance

Licenses

FINRA Exams: Series 7 – General Securities Representative Examination (Retired)
Series 65 – Uniform Investment Adviser Law Examination

Business Background

05/2023 – Present AllGen Financial Advisors, Inc.
Position: Investment Advisor Representative

07/2018 – 05/2023 Financial Consultant (Self-Employed)
Position: Owner

12/2017 – 06/2018 First Bank Puerto Rico
Position: Financial & ALM Analyst

10/2015 – 12/2017 Popular, Inc.
Position: Financial Analyst, Corporate M&A Division

DISCIPLINARY INFORMATION

Mr. Otero has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mr. Otero is not involved in any other business activities that would require disclosure in this Brochure Supplement. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Otero does not receive any economic benefit, incentives, sales awards, prizes, or bonuses from any outside source that are based on the number, or dollar amount, of sales, client referrals, or from opening new accounts.



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SUPERVISION

Paul Roldan

Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

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2026

This Brochure Supplement provides information about Andrew B. Philpott that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Philpott, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Andrew B. Philpott are also available on the SEC's website at www.adviserinfo.sec.gov.

Andrew B. Philpott

CRD#: 8048982

Year of Birth: 1999

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2021 – Valencia College: Associate of Arts

2024 – University of Central Florida: Bachelor of Science in Business Administration in Finance

Licenses

FINRA Exams: Series 65 – Uniform Investment Adviser Law Examination

Business Background

04/2025 – Present AllGen Financial Advisors, Inc.

Position: Trader/Investment Advisor Representative

05/2024 – 03/2025 AllGen Financial Advisors, Inc.

Position: Assistant Trader

08/2021 – 05/2024 University of Central Florida

Position: Fulltime Student

02/2022 – 07/2022 Publix

Position: Frontline Service Associate

06/2019 – 05/2021 Valencia College

Position: Fulltime Student

08/2017 – 05/2019 Methodist University

Position: Fulltime Student

DISCIPLINARY INFORMATION

Mr. Philpott has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mr. Philpott is not involved in any other business activities that would require disclosure in this Brochure Supplement. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Philpott does not receive any economic benefit, incentives, sales awards, prizes, or bonuses from any outside source that are based on the number, or dollar amount, of sales, client referrals, or from opening new accounts.



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SUPERVISION

Paul Roldan
Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

1
JANUARY
2026

This Brochure Supplement provides information about Edward J.W. Robinson that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Robinson, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Edward J.W. Robinson are also available on the SEC's website at www.adviserinfo.sec.gov.

Edward J.W. Robinson

CRD#: 6909067

Year of Birth: 1989

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2010 – Masters University: Bachelor of Arts in Biblical Studies
2021 – Corban University: Master's in Business Administration

Licenses

FINRA Exams: Series 7 – General Securities Representative Examination (Inactive)
Series 66 – Uniform Combined State Law Examination (Active)

Insurance: Florida Life, Health & Variable Annuity License

Business Background

08/2025 – Present One Family Church
Position: Pastoral Resident

06/2025 – Present AllGen Financial Advisors, Inc.
Position: Associate Advisor

01/2024 – 04/2025 Thrivent
Position: Financial Advisor

01/2021 – 01/2024 Portico Church
Position: Teaching Pastor

06/2023 – 08/2023 Evershore Financial Group
Position: Apprentice Financial Advisor

03/2019 – 12/2020 Riverside Church
Position: Family Life Pastor

08/2014 – 03/2019 Department of Veteran Affairs
Position: Veteran Service Representative

DISCIPLINARY INFORMATION

Mr. Robinson has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Licensed Insurance Agent

Mr. Robinson is a licensed independent insurance agent. He will receive the normal commissions associated with insurance sales. This creates an incentive for him to recommend, should you inquire, those products in which he will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage.

You are under no obligation to accept Mr. Robinson's recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "Client Referrals & Other Compensation". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Adviser Act of 1940, Rule 275.206.

ADDITIONAL COMPENSATION

Mr. Robinson does not receive any economic benefit, incentives, sales awards, prizes, or bonuses from any outside source that are based on the number, or dollar amount, of sales, client referrals, or from opening new accounts.



FORM ADV: PART 2B

BROCHURE SUPPLEMENT



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advisors@allgenfinancial.com
www.allgenfinancial.com

SUPERVISION

Paul Roldan

Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

1

JANUARY
2026

This Brochure Supplement provides information about Gillen A. Manos that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Manos, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Gillen A. Manos are also available on the SEC's website at www.adviserinfo.sec.gov.

Gillen A. Manos

CRD#: 8143579

Year of Birth: 2002

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2025 – University of Florida: Bachelor of Science in Business Administration

Licenses

FINRA Exams: Series 65 – Uniform Investment Adviser Law Examination

Business Background

05/2025 – Present AllGen Financial Advisors, Inc.

Position: Associate Advisor

01/2024 – 05/2024 University of Florida

Position: Teaching Assistant

08/2024 – 08/2024 Moisand, Fitzgerald, Tamayo, LLC

Position: Intern

05/2024 – 07/2024 Regions Bank

Position: Intern

08/2021 – 05/2025 University of Florida

Position: College Student

DISCIPLINARY INFORMATION

Mr. Manos has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mr. Manos is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Manos does not receive any economic benefit, incentives, sales awards, prizes or bonuses from any outside source that are based on the number or dollar amount of sales, client referrals, or from opening new accounts.



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FORM ADV: PART 2B

BROCHURE SUPPLEMENT



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SUPERVISION

Paul Roldan
Chief Compliance Officer

e-Mail: roldan@allgenfinancial.com

Mr. Roldan is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His responsibilities include, but are not limited to, reviewing investment activities to ensure all supervised persons are acting in your best interests in discharging their duties.

BROCHURE SUPPLEMENT
DATED

**12
MARCH
2026**

This Brochure Supplement provides information about Craig P. Sullivan that is an accompaniment to the Disclosure Brochure for our firm, AllGen Financial Advisors, Inc. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Sullivan, you are welcome to contact us – our contact information is listed to the left.

Additional information about AllGen Financial Advisors, Inc. and Craig P. Sullivan are also available on the SEC's website at www.adviserinfo.sec.gov.

Craig P. Sullivan

CRD#: 7574054

Year of Birth: 1979

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2001 – Valencia Community College: Associate of Science in Business & Associate of Arts in General Studies

Licenses

FINRA Exams: Series 65 – Uniform Investment Adviser Law Examination

Business Background

03/2026 – Present AllGen Financial Advisors, Inc.

Position: Client Service Associate

02/2021 – 02/2026 Royal Fund Management, LLC

Position: Investment Advisor Representative and Client Liaison

08/2004 – Present Hietpas Enterprises, Inc. dba: DCO Flooring

Position: Bookkeeper & General Manager

01/2025 – Present Journey Church Orlando

Position: Campus Admin Director

DISCIPLINARY INFORMATION

Mr. Sullivan has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mr. Sullivan is not involved in any other business activities that would require disclosure in this Brochure Supplement. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Sullivan does not receive any economic benefit, incentives, sales awards, prizes, or bonuses from any outside source that are based on the number, or dollar amount, of sales, client referrals, or from opening new accounts.



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