

Item 1 Cover Page



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Part 2A of Form ADV
DISCLOSURE BROCHURE

This brochure provides information about the qualifications and business practices of EVIA Investment Advisors, LLC (EVIA). If you have any questions about the contents of this Brochure, please contact us at (317) 800-6539, or dreichart@eviaadvisors.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

EVIA is a registered investment advisor, registered in the states of Indiana and Texas. Registration of an investment advisor does not imply a certain level of skill or training.

Additional information about EVIA Investment Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

This is an updated brochure, dated February 15, 2022. The following material changes should be noted:

- On July 15, 2022, a judge ruled in favor of EVIA Investment Advisors and president Daniel Reichart, finding no issue of material fact, regarding the allegations which had been made in a suit filed by Case Kemerly and Kemerly Services, LLC.
- Effective January 1, 2023, EVIA began using defensive products known as “buffered ETFs”. These products may not be suitable for every portfolio and they do carry additional internal expenses.

Currently, our Brochure may be requested by contacting Daniel Reichart, our Chief Compliance Officer, at (317) 800-6538, or at dreichart@eviaadvisors.com. Clients are also able to download this Brochure from the SEC's website: www.adviserinfo.sec.gov.

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Item 4 Advisory Business

Item 4A Description of our firm

EVIA Investment Advisors, LLC (EVIA) provides investors with a broad array of equity and fixed income products, designed to meet long-term goals. We utilize an investment process designed to deliver superior long-term performance with reduced volatility, primarily using individual equities and bonds. For clients whose asset level is less than \$100,000, we may utilize an ETF strategy, which allows for proper diversification, even with limited funds. EVIA has been built on the cornerstones of experience, consistency and service that we believe clients expect from their investment managers.

Experience - There is no substitute for experience in the investment world, where lessons are taught and learned during every market cycle. Experience provides valuable knowledge into portfolio and stock-specific risk and enables our managers to construct portfolios that we hope limit downside risk.

Consistency – Staying true to your investment philosophy can be one of the greatest challenges in the investment process. As market cycles come and go, there can be a great temptation to chase what is most currently popular. At EVIA, we are committed to a long-term investment philosophy, which puts an emphasis on quality companies with a history of rewarding investors. This may, at times, hurt performance during strong bull markets. However, it may also reduce downside movement during a bear cycle. It is our belief that this reduction in overall portfolio volatility adds long-term value.

Service – No matter what is going on with the markets, we never forget that we are the stewards of our client's investments. We believe that we must always be available for our clients and that we must proactively engage our clients to be sure that we are always aware of the changing circumstances of everyday life. Through consistent communication, we believe we can guide our clients through a wide variety of market fluctuations and help them to achieve their long-term goals.

EVIA was founded in 2014. The managing member is Daniel P. Reichart, MBA.

Item 4B Types of services offered

The services we provide include:

1. Investment advisory services – continuously review client investment portfolios and implement changes based on our client's needs and objectives.
2. Referrals to qualified professionals – utilize our network of qualified service providers in other areas of finance to help meet the needs of the client, beyond our specific relationship.
3. Financial planning – develop a comprehensive financial plan to address issues that impact every aspect of the client's financial situation.
4. Investment consulting services – deliver independent investment advice, research and analysis to meet our client's goals and objectives.

Item 4C How services are tailored to fit your needs

Client portfolios are structured to meet the needs of our individual clients. Our goal is to provide long-term investment performance results, consistent with the risk tolerance and investment objectives of each client. Some of our clients impose restrictions on investing in certain securities or types of securities. These restrictions are outlined in an Investment Policy Statement.

Item 4D Wrap fee programs

EVIA Investment Advisors provides investment management services to wrap fee programs. Assets in the wrap fee program are managed consistent with all other accounts with similar investment objectives. Through our investment advisory contract, we receive a portion of the wrap fee charged to clients for our investment services.

Item 4E Management of client assets

The assets under management by EVIA Investment Advisors are managed on a discretionary basis. We do not manage assets on a non-discretionary basis. As of December 31, 2021, the total assets under management were \$19,495,714.

Item 5 Fees and Compensation

Item 5A Compensation for advisory services

EVIA Investment Advisors charges investment advisory fees ranging from 0.75% to 1.50%, annualized, of the value of the assets on the last day of the previous quarter, based on the size of the account. Advisory fees are, generally, established from a set schedule. EVIA may, however, from time to time, provide account management services at discounted rates for special situations, which might include related accounts of significant clients, household related accounts, friends and family accounts, and employees. Published fee schedules are based on assets held in individual investment accounts and are as follows:

<u>Assets managed</u>	<u>Fee</u>
\$100,000 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.25%
\$1,000,001 - \$2,000,000	1.00%
\$2,000,001 and more	.075%

Investment Consulting

Investment consulting services can be charged in one of two ways:

1. As a fixed fee, typically ranging from \$500 to \$5,000, depending on the nature and complexity of the client's circumstances.
2. On an hourly basis at \$200 per hour. If appropriate, an estimate for total hours may be determined at the start of the investment consulting relationship.

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Consulting services fees are negotiated with each client. EVIA may, from time to time, provide account management services at discounted rates for special situations, which might include related accounts of significant clients, household related accounts, friends and family accounts, and employees.

Financial Planning

When requested, EVIA may provide a client with an analysis and financial plan. The client is responsible for providing us with all relevant information necessary to produce the plan. The fees for development and delivery of the financial plan are as follows:

1. As a fixed fee, typically ranging from \$500 to \$5,000, depending on the nature and complexity of the client's circumstances.
2. On an hourly basis at \$200 per hour. If appropriate, an estimate for total hours may be determined at the start of the investment consulting relationship.

Item 5B How advisory fees are collected

The fees for investment advisory services are billed and payable quarterly, in advance, based on the value of the assets on the last day of the previous quarter. While fees are, generally, deducted from the investment account, the client may elect to pay the fees via check, in the case of a qualified account.

The fees for investment consulting are billed and payable as follows:

1. Fixed fees will be paid 50% at the beginning of the consultation engagement and 50% upon completion of the engagement, including the client's receipt of any deliverables.
2. Hourly fees will be billed and payable on a weekly basis. The client receives an itemized invoice, which outlines the time spent and the work done.

Fees for investment consulting services are paid directly to EVIA Investment Advisors, LLC by check.

The fees for financial planning are billed and payable as follows:

1. Fixed fees will be paid 50% at the beginning of the consultation engagement and 50% upon completion of the engagement, including the client's receipt of any deliverables.
2. Hourly fees will be billed and payable on a weekly basis. The client receives an itemized invoice, which outlines the time spent and the work done.

Fees for investment consulting services are paid directly to EVIA Investment Advisors, LLC by check.

Item 5C Other fees you might pay

Clients may incur fees from the Custodian or other third-party service provider, which may include, but are not limited to, short-term redemption fees, transfer fees, RIA custodian fees, mutual fund fees, and exchange traded fund fees, in addition to advisory and consulting fees. See Item 12 for further discussion of brokerage costs. Upon request, EVIA will provide clients with a fee schedule, which includes all custody fees.

Item 5D Refund of fees paid in advance

The Investment Advisory Agreement may be cancelled by either party with a 30 day written notice. In the event of cancellation, any excess fees that have been paid will be refunded to the client, on a pro-rata basis.

Item 5E Compensation for the sale of securities

EVIA Investment Advisors reserves the right to work with clients whose assets do not meet the minimum account value. Those accounts are opened through the Investment Advisory Agreement and may be subject to other charges, including mutual fund 12b-1 fees.

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

EVIA Investment Advisors does not accept performance-based fees; defined as fees based on a share of the capital gains or capital appreciation of the client's assets.

Item 7 Types of Clients

EVIA Investment Advisors implements value-oriented investment strategies in both equity and fixed income portfolios and serves both institutional and individual investors. Our clients may include pension and profit sharing plans, corporations, charitable organizations, foundations, endowments, trusts and individuals, including high net worth individuals.

The minimum account size is \$100,000 for discretionary management and is flexible, in some circumstances. Some examples of these circumstances would include a previous client relationship, friends and family and employees, or clients within 20% of the \$100,000 threshold. All of these situations are examples of clients who may have access to discretionary management services with an account of less than \$100,000.

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

EVIA utilizes a disciplined process of security selection. Our asset allocation is a function of our world view of the economy and capital markets and may differ from the asset allocation process of other advisors. We utilize a risk management process, which focuses on both qualitative and quantitative measures of risk, in building and managing our asset allocation for each portfolio.

We screen databases, analyze publications and reports and talk with suppliers, vendors, competitors and managements to identify companies that fit our investment criteria. We conduct fundamental analysis on companies in which we invest to understand both the inherent risks and the opportunities. We implement a disciplined relative value assessment on securities considered for investment. Portfolio construction is achieved through a bottom-up approach, overlaid with a top-down asset allocation strategy, which helps to manage portfolio risk and meet performance objectives. The investment process is ongoing and each portfolio is continually monitored and evaluated.

The specific investment strategies we offer include:

Conservative

The Conservative strategy seeks to achieve capital preservation with the opportunity for modest long-term capital appreciation, while reducing the volatility of a traditional stock portfolio. The goal is to preserve the portfolio principal, while retaining the upside potential of the markets. Portfolio construction is primarily consistent of large cap, dividend paying common stocks and preferred stocks, as well as individually issued bonds. The asset mix is based on our relative value assessment of the market segment and the individual security. Security selection is based on fundamental analysis, including the analysis of (i) revenue growth, (ii) improvement in operating margins, (iii) attractive valuation, based on enterprise or asset value, (iv) a strong competitive position, and (v) a strong catalyst for a change in earnings expectations. Additional emphasis is given to the dividend yield of the security, as well as the potential for dividend growth. Portfolios generally include 30 to 45 securities. The minimum account size is \$100,000, which may be waived at EVIA's discretion.

Moderately Conservative

The Moderately Conservative strategy seeks to achieve current income and consistent long-term capital appreciation, while reducing the volatility of a traditional stock portfolio. The goal is to retain the upside potential of the markets, while providing some downside protection. Portfolio construction is, primarily large cap, dividend paying stocks, with a lesser focus on individual bonds. The asset mix is based on our relative value assessment of the market segment and the individual security. Security selection is based on fundamental analysis, including the analysis of (i) revenue growth, (ii) improvement in operating margins, (iii) attractive valuation, based on enterprise or asset value, (iv) a strong competitive position, and (v) a strong catalyst for a change in earnings expectations. Additional emphasis is given to the dividend yield of the security, as well as the potential for dividend growth. Portfolios generally include 30 to 45 securities. The minimum account size is \$100,000, which may be waived at EVIA's discretion.

Moderate

The Moderate strategy seeks to achieve long-term growth, while reducing overall portfolio volatility. The goal is to add companies with significant upside potential by employing the "growth at a reasonable price" approach to asset selection. Portfolio construction is a mix of large and mid-cap stocks, all of which have a history of paying dividends. The asset mix is based on our relative value assessment of the market sector and the individual security. Security selection is based on fundamental analysis, including the analysis of (i) revenue growth, (ii) improvement in operating margins, (iii) attractive valuation, based on enterprise or asset value, (iv) a strong competitive position, and (v) a strong catalyst for a change in earnings expectations. Additional emphasis is given to the dividend yield of the security, as well as the potential for dividend growth. Portfolios generally include 30 to 45 securities. The minimum account size is \$100,000, which may be waived at EVIA's discretion.

Moderately Aggressive

The Moderately Aggressive strategy seeks to achieve capital growth by investing in companies with the potential for stock market growth. By utilizing the Moderate process as our starting point, we build a core portfolio of companies with a history of rewarding investors through the payment of dividends. From there, we add individual bonds in a proportion that makes sense, based on the client's assessed tolerance for risk. The asset mix is based on our relative value assessment of the market sector and the individual

security. Security selection is based on fundamental analysis, including the analysis of (i) revenue growth, (ii) improvement in operating margins, (iii) attractive valuation, based on enterprise or asset value, (iv) a strong competitive position, and (v) a strong catalyst for a change in earnings expectations. Additional emphasis is given to the dividend yield of the security, as well as the potential for dividend growth. Portfolios generally include 30 to 45 securities. The minimum account size is \$100,000, which may be waived at EVIA's discretion.

Aggressive

The Aggressive strategy seeks to achieve capital growth at a rate that exceeds the S&P500. Portfolio construction is a mix of dividend-paying stocks from all asset classes. The asset mix is based on our relative value assessment of the market sector and the individual security. Security selection is based on fundamental analysis, including the analysis of (i) revenue growth, (ii) improvement in operating margins, (iii) attractive valuation, based on enterprise or asset value, (iv) a strong competitive position, and (v) a strong catalyst for a change in earnings expectations. Additional emphasis is given to the dividend yield of the security, as well as the potential for dividend growth. Portfolios generally include 30 to 45 securities. The minimum account size is \$100,000, which may be waived at EVIA's discretion.

*The fixed income portion of any of the EVIA portfolio strategies may be invested in any of the major investment grade sectors of the bond market, including US government securities, corporate bonds, municipal bonds, mortgage backed securities and other structured securities.

Item 8B & 8C Risks involved with investment strategies

It is possible to lose money in your portfolio. Some of the risks which could adversely affect your value, depending on your investment strategy are:

Common stock risk – Investment in common stocks and other equity securities are subject to the risk of changing economic, stock market, industry and company conditions and the risks inherent in our ability to anticipate changes that can adversely affect the value of the holdings.

Convertible securities risk – Convertible securities tend to be subordinate to other debtor equity securities. In part, the total return for a convertible security depends upon the performance of the underlying stock into which it can be converted. Issuers of convertible securities are often not as strong, financially, as those issuing securities with higher credit ratings, are more likely to encounter financial difficulties and, typically, are more vulnerable to changes in the economy, such as a recession or a sustained period of rising interest rates, which could impact their ability to make interest and principal payments. If the issuer stops making interest or principal payments, the entire investment could be lost.

Credit risk – Debt securities are subject to the risk that an issuer will fail to make timely payments of interest or principal, or go bankrupt, or that the value of the securities will decline because of a market perception that the owner may not make payment on time. The lower the rating of a debt security, the higher its credit risk.

Derivatives risk – Investment in derivatives causes more exposure to volatility and potential loss. Losses on investments in certain types of derivatives may exceed the initial investment.

Floating rate loan risk – The risks associated with a floating rate loan involve the value of the collateral securing the loan may decline, causing the loan to be substantially unsecured. The sale and purchase of a bank loan are subject to the requirements of the underlying credit agreement governing such bank loan. These requirements may place conditions or restrictions on sales and purchases of bank loans.

Bank loans are not traded on an exchange and purchases and sellers of bank loans rely on market makers, usually the administrative agent for a particular bank loan, to trade bank loans. These factors, in addition to the overall market volatility, may negatively impact the liquidity of loans. Difficulty selling a floating rate loan may result in a loss.

Borrowers may pay back principal before the scheduled due date when interest rates decline, which may require the replacement of the loan with a lower-yielding security. There may be less extensive public information available with respect to loans than for rated, registered or exchange listed securities.

Foreign securities risk – Foreign securities involve special risks such as currency fluctuations, economic or financial stability, lack of timely or reliable financial information and unfavorable political or legal developments and delays in enforcement of rights. These risks are increased in emerging markets.

Interest rate risk – Debt securities will generally lose value if interest rates increase. US Government securities can exhibit price movements, resulting from changes in interest rates. Interest rate risk is generally higher for investments with longer maturities or durations. Treasury inflation protected securities (“TIPS”) can also exhibit price movement as a result of changing inflation expectations and seasonal inflation patterns.

Liquidity risk – A particular investment may be difficult to purchase or sell. The inability to sell an illiquid security at an advantageous time or price may result in a loss.

Loss of money risk – Any investment may lose money.

Market changes risk – Investments may change because of broad changes in the markets.

Management risk – Investment management applies investment techniques and risk analyses in making investment decision for your portfolios. But there can be no guarantee that these decisions will produce desired results.

Prepayment and call risk – When mortgages and other obligations are prepaid and when securities are called, it may require reinvestment in securities at a lower yield, or fail to recover additional amounts paid for securities with higher interest rates, resulting in unexpected capital loss.

Regulatory risk – Changes in government regulation may adversely affect the value of an investment.

Item 9 Disciplinary Information

In June of 2019, EVIA Investment Advisors and its president, Daniel Reichart were named as parties in a lawsuit alleging interference with an existing business contract. Both EVIA and Mr. Reichart deny the allegations. The suit is still pending.

Item 10 Other Financial Industry Activities and Affiliations

EVIA Investment Advisors, LLC is an independent registered investment advisor. We are not affiliated with any other financial institution.

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

Item 11A Code of ethics

EVIA has adopted a Code of Ethics (the “Code”) for all our officers and employees, which sets forth our standards of conduct and requires compliance with federal and state securities laws. The Code is based on the principle that the officers and employees owe a fiduciary duty to our clients and, as fiduciary, we owe our clients a duty of honesty, good faith and fair dealing. In addition, our employees who are in a position to exploit information about client securities transactions or holdings must conduct their personal securities transactions in a manner that does not violate the federal securities laws, interfere with client portfolio transactions or otherwise take unfair advantage of their relationship to the clients.

Our employees have an ethical and legal obligation to avoid any conflicts of interest situations and to report potential conflicts and seek clarification when warranted. Among other things, the Code prohibits the acceptance of gifts, services, trips, entertainment and other items of more than negligible value and participation in personal or unrelated business transactions that create a conflict of interest with our firm or our clients.

In order to effectively enforce the Code, we have adopted numerous compliance procedures to monitor compliance with the Code of Ethics. These procedures include pre-clearance of personal transactions; reporting certain personal securities transactions; and requiring all employees to identify certain securities accounts, along with a listing of certain securities they own at the time they join our firm and annually, thereafter. Annually, all employees must acknowledge and accept the Code. Upon discovery of a violation of the Code, we may impose such sanctions as are deemed appropriate, including, among other things, a letter of censure, disgorgement of profits obtained in connection with the violation, the imposition of fines, restrictions on future personal trading, suspension, termination of employment, or criminal referral of the violator.

Item 11B Client transactions

EVIA does not affect any principal or agency cross securities transactions for client accounts. Neither does our firm buy or sell for client accounts, securities in which our firm, or a related person, has a material financial interest.

Item 11C & 11D Personal trading

Employees and officers of our company may have personal ownership interest in the same securities owned by and recommended to our clients. Officers and employees may not benefit, either directly or indirectly, from transactions placed on behalf of advisory accounts. Officers and employees are required to disclose, to the Chief Compliance Officer (CCO), the names of all broker/dealer firms with whom personal accounts are maintained, and to arrange for each broker/dealer firm to send duplicate statements to the CCO. The client's interest will supersede the interest of any officer or employee, and every reasonable attempt will be made to avoid conflicts of interest.

Item 12 Brokerage Practices

EVIA Investment Advisors, LLC is not a broker/dealer and relies on the Custodian to execute trades on behalf of the Client. As a result, EVIA relies on the Custodian broker/dealer to provide best execution in accordance with its own policies and procedures.

EVIA does not engage in "soft dollar" practices involving the receipt of research or other brokerage service in relation to client commission money, nor do we receive any research or other products in connection with Client transactions.

In the interest of better trade execution, EVIA may, but is not required to, aggregate orders for a Client's account with orders of other Clients. EVIA may aggregate securities sale and purchase orders for a Client with similar orders being made contemporaneously for other Client accounts. In such event, the average price of the securities purchased or sold in such a transaction may be determined and a Client may be charged or credited, as the case may be, the average transaction price. As a result, however, the price may be less favorable to the Client than it would be if similar transactions were not being executed concurrently for other Accounts.

Item 13 Review of Accounts

Client holdings are reviewed on a continuous and best efforts basis. All portfolio reviews are based on the investment objectives and constraints set forth by each client. Portfolio reviews are scheduled at least annually with each client. Portfolio reviews may also be triggered by market conditions, the request of the client, a change in the client's investment objectives, or a rebalancing due to a change in the asset allocation. The assigned portfolio manager performs all client portfolio reviews.

The Custodian will provide you with a report that may include such relevant account and/or market related information, such as an inventory of account holdings and account performance on a quarterly basis. You will also receive confirmations of each transaction executed for the account and brokerage statement no less frequently than quarterly, directly from the custodian. EVIA may also generate interim reports, which show the Client's progress toward his/her stated goals.

Item 14 Client Referrals and Other Compensation

Upon request, EVIA may refer clients to other professional service providers who may assist the client with services that EVIA does not offer. In some cases, EVIA may receive a referral fee for those referrals. Conversely, EVIA may pay, to professionals who refer clients to EVIA, a solicitation or referral

fee. The amount of the fee ranges between 10% and 25% of the annual fee paid to EVIA for varying lengths of time. The fee must be disclosed to the client in writing and acknowledged by the client via signature of a disclosure document. Payment of such a fee shall not increase the amount paid by the client for EVIA's investment management services.

Item 15 Custody

EVIA does not maintain custody of any Client funds or securities. EVIA provides instructions to the custodian broker/dealer, regarding the investment of the Client's assets.

Each Client will receive account information, including trade confirmations and quarterly account statements, directly from the custodian broker/dealer. Each client should carefully review this information and compare it with any information provided by EVIA when they are evaluating Account performance, securities holdings, and transactions. While EVIA reconciles trading information with the custodian on a regular basis and provides account information to clients on the site, a client may experience differences in the information due to pending transactions, dividends, corporate actions, cash movements or withdrawals, or other activity. Only the custodian broker/dealer's trading confirmations and statements represent the official records of a client's account.

Item 16 Investment Discretion

EVIA is retained to manage clients' accounts on a discretionary basis and, in such capacity, we are authorized to direct execution of portfolio transactions without specific consultation with the client on each trade. This discretion allows us the authority over the selection and amount of securities to be bought and sold into the client's account without obtaining prior consent. However, these purchases and sales may be subject to specific investment objectives, guidelines, or limitations previously set forth by the client. The granting of such authority will be evidenced by the client's execution of an investment advisory agreement and/or investment policy statement containing all applicable limitations to such authority.

In certain situations, where EVIA has been retained on an hourly fee basis, discretion may be waived. In these instances, no trades will be placed without prior consent of the account owner. Consent must be given with consideration of timing, so the account owner should not expect action through voicemail, e-mail, or other communication methods that may present a delay.

Item 17 Voting Client Securities

EVIA does not vote proxies on behalf of clients.

Item 18 Financial Information

In accordance with the terms of the investment advisory agreement, fees for investment management services are billed and payable in advance at the beginning of each quarter. Additionally, 50% of fees for investment consulting services and financial planning may be billed in advance, with the remainder due upon completion of the consulting services or delivery and acceptance of the financial plan.

EVIA does not foresee any financial condition that is reasonably likely to impair our ability to meet contractual commitments to our clients. EVIA has not been the subject of a bankruptcy petition at any time.

Item 19 Requirements for State-Registered Advisers

The president of EVIA Investment Advisors, LLC is Daniel Reichart. Mr. Reichart holds a Masters degree in Business Administration from the Miller School of Business at Ball State University. He has been in the investment business for more than 30 years, holding a variety of sales and leadership positions.

EVIA does not participate in any business beyond what has been described in the brochure.

Item 20 Additional Information

EVIA views protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker/dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you, or your accounts, to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.