



## ITEM 1 COVER PAGE

# John Eadie

## Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 27, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about John Eadie that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

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

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## ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

John Eadie was born in 1961. Mr. Eadie graduated from Berry College with a Bachelor of Science degree in Accounting and from the University of Georgia with a Master of Accountancy. Mr. Eadie is a Managing Member and has been employed as an investment adviser representative of Covenant Multi-Family Offices, LLC since February of 2010. From December 2003 to February 2010, Mr. Eadie was employed as an Executive Vice President of Frost National Bank. Mr. Eadie spent from September 1984 to December 2003 at Ernst & Young where he last served as the firm's director of Executive Planning Services for the South/Central Texas market.

Mr. Eadie has held the designation of Certified Public Accountant ("CPA") since 1986. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing

professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Mr. Eadie has held the designation of Personal Financial Specialist ("PFS") since 1992. The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

Mr. Eadie has been a CFA® Charter Holder since 2002. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute – the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study

per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders— often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Mr. Eadie has held the designation of Certified Investment Management Analyst (CIMA®) since 1997. The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass an online Certification Examination. CIMA® designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA®).

Mr. Eadie has been a CERTIFIED FINANCIAL PLANNER™ since 1994. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that

govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning- related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Eadie has held the designation of Chartered Life Underwriter (CLU®) since 2010. CLU® is a financial planning designation for the insurance industry conferred by The American College. Candidates must meet education, experience, examination, and continuing ethical requirements. Candidates must have at least three years of experience in the financial industry, or an undergraduate or graduate degree from an accredited

university and two years of experience in the financial industry. Candidates are required to take eight academic courses each followed by an exam. The courses and exams cover topics in finance, investing, insurance, and estate planning.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. Licensed Insurance Agent. Mr. Eadie, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Eadie to purchase insurance products on a commission basis. Conflict of Interest: The recommendation by Mr. Eadie that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Eadie. Clients are reminded that they may purchase insurance products recommended by Mr. Eadie through other, non-affiliated insurance agents. The Registrant's Chief Compliance Officer, Rebecca A. Crowder, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

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### ITEM 5 ADDITIONAL COMPENSATION

None.

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### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.



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## Barron D. Beal

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Barron (“Barry”) Beal that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Barry Beal is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Barry Beal was born in 1966. Mr. Beal graduated from Baylor University with a Bachelor of Business Administration degree in Finance and Accounting. Mr. Beal has been a partner and managing director of Covenant Multi-Family Offices, LLC since May of 2012. From April of 2010 to April of 2012, Mr. Beal was the director of sales and wealth management at True North Advisors, LLC. From October of 2008 to March of 2010, Mr. Beal was a wealth advisor at Frost National Bank. From November of 2006 to June of 2008, Mr. Beal was an executive vice president of wealth management at the BOK Financial, Inc. Prior to this, Barry enjoyed a 17 year career at JP Morgan Chase (and its predecessors) from June of 1989 until October of 2006.

Mr. Beal has held the designation of Certified Private Wealth Advisor® (CPWA®) since November 2013. The CPWA designation signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on management topics and strategies for high-net-worth clients. Prerequisites for the CPWA designation are: a Bachelor’s degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC®, CFA®, CFP®, ChFC® or CPA license; acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements; five years of professional client-centered experience in financial services or a related industry; and two letters of reference from an

IMCA member, professional supervisor, or currently licensed professional in financial services or a related industry. CPWA designees must complete a six-month pre-class educational component; a five-day classroom education program through The University of Chicago Booth School of Business; and pass a comprehensive examination. CPWA designees are required to adhere to IMCA's Code of Professional Responsibility and Rules and Guidelines for Use of the Marks. CPWA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA®).

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
  - B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.
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### ITEM 5 ADDITIONAL COMPENSATION

None.

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### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.



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ITEM 1 COVER PAGE

## Justin Joseph Pawl

### Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Justin Joseph Pawl that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Justin Joseph Pawl is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Justin Joseph Pawl was born in 1972. Mr. Pawl graduated from the University of California at Santa Barbara in 1994, with a Bachelor of Arts degree in Environmental Sciences and in 1998, with a Masters in Biogeochemistry. Mr. Pawl has been an investment adviser representative of Covenant Multi-Family Offices, LLC since June of 2012 and the Chief Investment Officer since June 2012. From February of 2010 to May of 2012, Mr. Pawl was the co-founder and portfolio manager for Evolved Alpha. From October of 2007 to January of 2010, Mr. Pawl was the founding partner of Alpha titans. From October 2005 to September of 2007, Mr. Pawl was the Senior Vice President of Santa Barbara Alpha Strategies.

Mr. Pawl has been a CFA® Charter Holder since 2004. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute – the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations;



2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Mr. Pawl has held the designation of Chartered Alternative Investment Analyst (CAIA) since March 2009. The CAIA designation, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investments, structures, and ethical obligations. To qualify for the CAIA designation, finance professionals must complete a self-directed, comprehensive course of study on risk-return attributes of institutional quality alternative assets; pass both the Level I and Level II CAIA examinations at global, proctored testing centers; attest annually to the terms of the

Member Agreement; and hold a US bachelor's degree (or equivalent) plus have at least one year of professional experience or have four years of professional experience.

Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related fields. Once a qualified candidate completes the CAIA program, he or she may apply for CAIA membership and the right to use the CAIA designation, providing an opportunity to access ongoing educational opportunities.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

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### ITEM 5 ADDITIONAL COMPENSATION

None.

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### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.



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## David S. Akright

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated January 10, 2019

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about David S. Akright that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

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

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

David S. Akright was born in 1990. Mr. Akright graduated from University of Colorado at Boulder in 2012, with a Bachelor of Arts degree in Economics and University of Texas at San Antonio in 2016, with a Masters of Science in Finance. Since January of 2018, Mr. Akright has been a Wealth Advisor of Covenant Multi-Family Offices, LLC. From December of 2017 through July of 2013, Mr. Akright was an associate of client services of Covenant Multi-Family Offices, LLC. From May of 2012 to June of 2013, Mr. Akright was a financial professional at Jefferson and Franklin Financial.

Mr. Akright has been a CERTIFIED FINANCIAL PLANNER™ since 2018. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning- related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

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#### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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#### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.



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ITEM 1 COVER PAGE

## May Atassi

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated November 19, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about May Atassi that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did *not* receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

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

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

May Atassi was born in 1996. Ms. Atassi graduated from Baylor University in May 2018, with a Bachelor of Business Administration degree in Finance. Ms. Atassi joined Covenant Multi-Family Offices as an Associate Wealth Advisor in June 2018. While at Baylor University, Ms. Atassi worked for the university as a tutor/teacher's assistant from November 2017 to May 2018. She completed an internship at AXA Advisors in Austin from June to August 2017. Ms. Atassi also worked as a Housing Tour Guide for Baylor University from January to May 2016.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business

or occupation for compensation.

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#### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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#### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.





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ITEM 1 COVER PAGE

# Lorrie K. Clark

## Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Lorrie K. Clark that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Lorrie K. Clark is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Lorrie K. Clark was born in 1970. Ms. Clark graduated from Western New Mexico University with a Bachelor of Science degree in Accounting. Ms. Clark has been employed as an investment adviser representative of Covenant Multi-Family Offices, LLC since February of 2010. From February 2008 to February 2010, Ms. Clark was employed as a Wealth Services Analyst of Frost National Bank. From January 2004 through February 2008, Ms. Clark was a Cash Management Manager with Advantage Rent A Car.

Ms. Clark has held the designation of Enrolled Agent (EA) since 2014. Enrolled Agent (EA) is a tax professional who has passed an IRS test covering all aspects of taxation, plus passed an IRS background check. Enrolled Agents have passed a three part examination with continuing education requirements. The examination (called the Special Enrollment Examination) covers all aspects of federal tax law, including the taxation of individuals, corporations, partnerships, and various regulations governing IRS collections and audit procedures. Like CPAs and tax attorneys, EAs can handle any type of tax matter and represent their client's interests before the IRS. Unlike CPAs and tax attorneys, Enrolled Agents are tested directly by the IRS, and enrolled agents focus exclusively on tax accounting. The "EA" designation may be revoked by the IRS' Office of Professional Responsibility for malpractice.





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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
  - B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.
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### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.



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## Sam Dreibelbis

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Sam Dreibelbis that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did *not* receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

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

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Sam Dreibelbis was born in 1990. Mr. Dreibelbis graduated from Pennsylvania State University in 2014, with Bachelor of Science degrees in Finance and Accounting and Masters of Science degree in Accounting. Since July of 2017, Mr. Dreibelbis has been an associate of client services of Covenant Multi-Family Offices, LLC. From September of 2014 to March of 2017, Mr. Dreibelbis was a assurance associate at Ernst and Young LLP.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

## ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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## ITEM 6 SUPERVISION

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## Scott R. Duncan

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Scott R. Duncan that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Scott R. Duncan is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Scott R. Duncan was born in 1951. Mr. Duncan graduated from Oklahoma Baptist University, with a Bachelor of Arts degree in Social Psychology in 1974 and received a Master of Science degree in Financial Services from American College. Since February 2015, Mr. Duncan has been a Senior Wealth Advisor of Covenant Multi-Family Offices, LLC. From June 1984 through February 2015, Mr. Duncan was the President of Covenant Financial Services located in Oklahoma City.

Mr. Duncan is a CERTIFIED FINANCIAL PLANNER™. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning- related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Duncan has held the designation of Chartered Financial Consultant (ChFC®) since October 1, 1982. The ChFC® designation has been a mark of excellence for almost thirty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from

such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

Mr. Duncan has held the designation of Chartered Life Underwriter (CLU®) since October 1, 1981. CLU® is a financial planning designation for the insurance industry conferred by The American College. Candidates must meet education, experience, examination, and continuing ethical requirements. Candidates must have at least three years of experience in the financial industry, or an undergraduate or graduate degree from an accredited university and two years of experience in the financial industry. Candidates are required to take eight academic courses each followed by an exam. The courses and exams cover topics in finance, investing, insurance, and estate planning.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.

B. Licensed Insurance Agent. Mr. Duncan, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Duncan to purchase insurance products on a commission basis. Conflict of Interest: The recommendation by Mr. Duncan that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a client's need. No client is under any obligation to purchase any insurance commission products from Mr. Duncan. Clients are reminded that they may purchase insurance products recommended by Mr. Duncan through other, non-affiliated insurance agents. The Registrant's Chief Compliance Officer, Rebecca A. Crowder, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

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### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

## ITEM 6 SUPERVISION

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## Harriet M. Helmle

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Harriet M. Helmle that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Harriet M. Helmle is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Harriet M. Helmle was born in 1946. Ms. Helmle graduated from the University of Texas at Austin with a Bachelor of Science degree in Home Economics. Ms. Helmle has been employed as the Director of Client Relations of Covenant Multi-Family Offices, LLC since February of 2010. From May 1998 to February 2010, Ms. Helmle was employed as a Senior Vice President of Frost National Bank.

Ms. Helmle has held the designation of Certified Public Accountant ("CPA") since 1980 but is currently a retired CPA. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of



Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
  - B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.
- 

### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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## Donna Kathryn Herndon

### Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Donna Kathryn Herndon that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Donna Kathryn Herndon is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Donna Kathryn Herndon was born in 1960. Ms. Herndon has no formal education after high school. Since February 2015, Ms. Herndon has been a Senior Client Service Associate of Covenant Multi-Family Offices, LLC. From June 2011 through February 2015, Ms. Herndon was the Operations Manager with Covenant Financial Services. From September 1989 through June 2011, Ms. Herndon was the Operations Manager with Lombard-Smith Investments.

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#### ITEM 3 DISCIPLINARY INFORMATION

None.

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#### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

#### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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## John Glenn Keeton

# Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about John Glenn Keeton that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about John Glenn Keeton is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

John Glenn Keeton was born in 1980. Mr. Keeton graduated from Texas State University in 2003 with a Bachelor of Business Administration degree in Finance and from the University of Houston in 2008 with a Master of Science degree in Finance. Mr. Keeton has been a Senior Wealth Advisor of Covenant Multi-Family Offices, LLC since January 2018. From December of 2017 through July of 2013 and from February 2010 through July 2010, Mr. Keeton was a Wealth Advisor with Covenant Multi-Family Offices, LLC. From August 2010 through July 2013, Mr. Keeton was a Banker Associate with JPMorgan Private Bank. From April 2009 through February 2010, Mr. Keeton was a Wealth Manager with Frost Bank and from March 2008 through April 2009, Mr. Keeton was a registered representative of SMH Capital.

Mr. Keeton has been a CFA® Charter Holder since 2012. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute – the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To

earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards - The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition - Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge - The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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#### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
  
  - B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.
- 

#### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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## Raquel R. Lopez

### Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Raquel R. Lopez that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Raquel R. Lopez is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Raquel R. Lopez was born in 1976. Ms. Lopez graduated from Southern Nazarene University, with a Bachelor of Science degree in Business in 2007. Since February of 2015, Ms. Lopez has been a Wealth Advisor of Covenant Multi-Family Offices, LLC. From February 2004 through February 2015, Ms. Lopez was a Vice President of Investor Relations with Covenant Financial Services.

Ms. Lopez has been a CERTIFIED FINANCIAL PLANNER™ since 2007. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the

following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning- related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES



- A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.
  - B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.
- 

#### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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## Mark Richard Nokyos

### Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated March 29, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Mark Richard Nokyos that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Richard Nokyos is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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#### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Mark Richard Nokyos was born in 1975. Mr. Nokyos graduated from the University of Texas in 1999 with a Bachelor of Arts degree in Finance. Mr. Nokyos has been a Wealth Advisor of Covenant Multi-Family Offices, LLC since July of 2013. Prior to joining Covenant Mr. Nokyos spent 9 years with JPMorgan in their Private Banking group followed by a brief tenure as Vice President with the Bank of Texas in a similar Private Banking position.

Mr. Nokyos has been a CERTIFIED FINANCIAL PLANNER™ since 2005. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

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- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
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- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any other investment-related businesses or occupations.
  - B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.
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#### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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#### ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Rebecca A. Crowder, is primarily responsible for the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Crowder at (210) 403-5350.





Live the life you've earned.™

ITEM 1 COVER PAGE

# Oliver M. Norman

## Covenant Multi-Family Offices, LLC

Brochure Supplement  
Dated November 19, 2018

Contact: Rebecca A. Crowder, Chief Compliance Officer  
18756 Stone Oak Parkway, Suite 102  
San Antonio, Texas 78258

This Brochure Supplement provides information about Oliver M. Norman that supplements the Covenant Multi-Family Offices, LLC Brochure; you should have received a copy of that Brochure. Please contact Rebecca A. Crowder, Chief Compliance Officer, if you did not receive Covenant Multi-Family Offices, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Oliver M. Norman is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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### ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Oliver M. Norman was born in 1984. Mr. Norman graduated from University of Sheffield, with a Bachelor of Arts degree in Business Accounting and Financial Management in 2005. Since February 2015, Mr. Norman has been a Wealth Advisor of Covenant Multi-Family Offices, LLC. From December 2012 through February 2015, Mr. Norman was an advisor with Covenant Financial Services. From June 2010 through September 2012, Mr. Norman was a Senior Financial Advisor with HSBC and from January 2005 through June 2010, Mr. Norman was a Financial Advisor with Royal Bank of Scotland.

Mr. Norman has been a CERTIFIED FINANCIAL PLANNER™ since 2016. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning- related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Norman has held the designation of Chartered Financial Consultant (ChFC®) since March 2, 2017. The ChFC® designation has been a mark of excellence for almost thirty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional

electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

Mr. Norman has held the designation of Chartered Life Underwriter (CLU®) since August 1, 2018. CLU® is a financial planning designation for the insurance industry conferred by The American College. Candidates must meet education, experience, examination, and continuing ethical requirements. Candidates must have at least three years of experience in the financial industry, or an undergraduate or graduate degree from an accredited university and two years of experience in the financial industry. Candidates are required to take eight academic courses each followed by an exam. The courses and exams cover topics in finance, investing, insurance, and estate planning.

Mr. Norman earned the designation of Certified Divorce Financial Analyst (CDFA®) on October 31, 2018. A CDFA® professional has specialized skills and experience that enables him to analyze the long-term financial impact of divorce. These professionals have met specific education, experience and ethical requirements, and have been designated CDFA® professionals by the Institute for Divorce Financial Analysts (IDFA™). The CDFA® professional abides by a Code of Ethics and completes continuing education requirements on a bi-annual basis

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### ITEM 3 DISCIPLINARY INFORMATION

None.

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### ITEM 4 OTHER BUSINESS ACTIVITIES

A. The supervised person is not actively engaged in any other investment-related business or occupation for compensation.

B. Licensed Insurance Agent. Mr. Norman, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Norman to purchase insurance products on a commission basis. Conflict of Interest: The recommendation by Mr. Norman that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Norman. Clients are reminded that they may purchase insurance products recommended by Mr. Norman through other, non-affiliated insurance agents. The Registrant's Chief Compliance Officer, Rebecca A. Crowder, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

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### ITEM 5 ADDITIONAL COMPENSATION

The supervised person's annual compensation is based, in part, on the amount of assets under management that they introduce to the Registrant. Accordingly, the supervised persons has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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## ITEM 6 SUPERVISION

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