Item 1: Cover Page

Ignite Financial Planning

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Form ADV Part 2A – Firm Brochure

Dated: January 12, 2026

This Brochure provides information about the qualifications and business practices of Millennial Wealth, LLC ("MW"). If you have any questions about the contents of this Brochure, please contact us at (206) 207-8426. 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.

Millennial Wealth, LLC is registered as an Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about MW is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the firm's identification number 289970.

Item 2: Material Changes

The last annual update of this Brochure was filed on January 16, 2025. Since then, there have been no material changes made.

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Item 4: Advisory Business

Description of Advisory Firm

Millennial Wealth LLC is registered as an Investment Adviser, principally located in the state of Washington. We are a limited liability company founded in 2017. Levi Sanchez is the principal owner and Chief Compliance Officer (“CCO”).

Millennial Wealth LLC also uses the assumed business name of Ignite Financial Planning. As used in this brochure, the words “MW”, "we", "our firm", “Advisor” and "us" refer to Millennial Wealth LLC and Ignite Financial Planning and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

Types of Advisory Services

Currently, we offer the following investment advisory services, personalized for each individual client:

- Comprehensive FInancial Planning - This includes Financial Planning and Discretionary Investment Management services

Comprehensive Financial Planning

Comprehensive FInancial Planning encompasses financial planning and investment management services. This service involves working one-on-one with a financial planner (“planner”) over an extended period of time. Through this ongoing arrangement, clients are expected to collaborate with the planner to develop and assist in the implementation of their financial plan (the “plan”). The planner will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the client’s situation, goals, and objectives evolve.

Financial Planning. Upon engaging Advisor for financial planning services, MW is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the client that is essential to understanding the client’s personal and financial circumstances; helping the client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the client’s current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the client’s progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the client in order for the planner to establish a financial plan and implementation strategy that provides the client with the most appropriate options in pursuing their established goals and objectives.

Investment Management. Advisor also offers Investment Management services, in addition to financial planning services. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We

will also review and discuss a client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as risk tolerance and tax considerations.

We primarily advise our clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in the client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the client's request.

When we provide investment management services, clients grant us limited authority to buy and sell securities on a discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

For certain clients with $500,000 or more in assets we manage, we may offer to offset tax filing and estate planning services through our partners at no additional cost. There is no obligation to use our recommended providers and we do not share in their fee nor receive any referral compensation.

In addition to managing investment portfolios directly, we will also provide ongoing advice and supervision on accounts that the client chooses to have us monitor and provide recommendations for but cannot be transferred to one of our recommended custodians listed in Item 12. These accounts may include 529 Plans, 401(k) and other employer sponsored tax qualified accounts, as well as other brokerage accounts that the client maintains at other financial institutions ("held-away accounts"). This portion of the service will include MW's selection of the appropriate investments based on the options that are available for the clients' held away account(s) and ongoing monitoring and reporting on those accounts. MW may include the value of any held away accounts when calculating the total advisory fee for accounts in which MW provides ongoing advice and supervision.

When suitable, we may utilize the services of third-party investment advisers ("Money Managers") to assist with the management of client accounts. Our review process and analysis of Money Managers is further discussed in Item 8 of this Brochure.

Financial Planning Topics

In general, the financial plan will address some or all of the following areas of concern. The client and MW will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Cash Flow and Budgeting**: We'll conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. This will include recommendations on how to automate the majority of monthly cash flow. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings**: Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid.

- **Debt Management:** We'll review existing debt and determine the best strategies to consolidate, pay down, or decrease interest paid over time based on the overall financial situation. We'll also assist with large asset purchases and financing strategies such as mortgages.

- **Employee Benefits Optimization**: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

- **Estate Planning**: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Goals-Based Planning**: We will help clients identify and articulate financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

- **Insurance Advice**: We will review existing policies to ensure proper coverage for life, health, disability, property & casualty policies. If additional insurance coverage is recommended, we'll review new policies with you to ensure adequate coverage is in place.

- **Retirement Planning**: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Tax Planning Strategies:** Advice may include ways to minimize current and future taxes as a part of your overall financial picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We will work with or consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes outside of the firm we use. We will participate in meetings or phone calls between you and your tax professional with your approval.

Client Tailored Services and Client Imposed Restrictions

We tailor the delivery of our services to meet the individual needs of our clients. We consult with clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the clients' investment and/or planning needs.

Clients can specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to MW in writing. MW will notify clients if they are unable to accommodate any requests.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets under Management

As of December 31, 2025, MW has $209,277,221in discretionary and $69,438,226 in non-discretionary assets under management.

Item 5: Fees and Compensation

Please note, unless a client has received this brochure at least 48 hours before signing an Advisory Contract, the Advisory Contract may be terminated by the client within five (5) business days without penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees; however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior client consent. Fees are negotiable. Some fees may vary by client but similar services are provided due to factors such as honoring legacy fees, discounts for friends and family of our employees, anticipated assets, and complexity of overall engagement.

Comprehensive Financial Planning

Our Comprehensive Financial Planning service integrates Financial Planning and Investment Management. Clients may be charged a one-time engagement fee and an ongoing fee every month or quarter.

The one-time engagement fee covers onboarding, data gathering, and the construction of a comprehensive financial plan. The one-time fee ranges from $1,000 to $20,000 and will be based on complexity and the depth of service required. This work will commence immediately after the fee is paid, and the length of time required to complete and deliver the plan is dependent on several factors, including the needs of the client, the client's ability to provide any necessary information and documentation, as well as the complexity of their financial situation. Advisor may reduce or waive the initial fee at the Advisor's discretion.

The ongoing fee is based on account size. The fee will be a recurring fixed fee for those whose assets are less than $500,000. For clients whose assets are $500,000 or more, the fee will be based on a percentage of the assets under management.

Recurring Fixed Fee

Wealthbase

For smaller accounts, we charge a fixed annual fee ranging from $2,000 to $30,000, billed monthly or quarterly in arrears. The fee range is dependent upon variables, including the specific needs of the client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fees are negotiable, and your Advisory Contract will outline the final agreed-upon fee. The annual fee shall be adjusted upwards by 3% every year on the anniversary of the Advisory Contract.

Once a client's investable assets begin to grow to a range of $500,000, they will transition to our AUM Fee Schedule described below and will no longer pay the fixed fee; unless otherwise agreed to in writing by both parties. The fixed fee will cease at the end of the month or quarter when the AUM fee commences. If the client's accounts drop below the threshold for a period of two (2) consecutive quarters or (6) consecutive months, clients will revert to the agreed-upon fixed fee rate.

A Percentage of Assets Under Management ("AUM")

Wealthplus

MW charges an annual management fee of up to 1.50%. The fee is negotiable, and the exact fee paid by you will be stated in the signed Advisory Contract. The annual advisory fee is paid either monthly or quarterly in arrears based on the value of the client's account(s) as of the last day of the billing period.

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. MW relies on the valuation as provided by the client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

Use of Third Party Money Managers

In the event MW utilizes a third party money manager (Money Manager) to assist in the management of client account(s), the Money Manager's fees are separate and not included in our advisory fee disclosed above. The Money Manager's advisory fees, billing schedule, and payment procedures are set forth in their separate written disclosure documents, advisory agreements, and/or the account opening documents of your account Custodian.

Fee Payment

Typically, we deduct our advisory fee from one or more account(s) held at an unaffiliated third-party custodian, as directed by the client. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Fees for advising on the held-away accounts may be paid from the managed account (or other accounts) the client has under our direct management.

Alternatively, fees can be paid by electronic funds transfer (EFT) or check. We use an independent third-party payment processor in which the client can securely input their banking information and pay their fee. We do not have access to the client's banking information at any time. The client will be provided with their own secure portal in order to make payments.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with MW.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

Terminations and Refunds

For Comprehensive Financial Planning, the Advisory Contract may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination.

Sales of Securities or Other Investment Products

We do not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide advisory services to individuals and high-net-worth individuals.

We have a minimum account size requirement ranging from $500,000 for our AUM Fee Schedule. These minimums may be waived or reduced at the Advisor's discretion. For those clients who do not meet our minimum, we have our recurring fixed fee option.

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

Below is a brief description of our methods of analysis and primary investment strategies.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Passive Investment Management involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Use of Money Managers: We may refer Clients to Third Party Investment Advisers or advisory programs ("Money Managers"). Our analysis of Money Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Money Managers in an attempt to determine if that Money Manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the Money Manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the Money Manager's compliance and business enterprise risks. A risk of investing with a Money Manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, we do not control the underlying investments in a Money Manager's portfolio. There is also a risk that a Money Manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the Money Manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Direct Indexing: MW may utilize direct indexing through the use of separately managed accounts, managed by Money Managers. Direct indexing allows clients to own individual stocks that reflect the characteristics of a chosen index. This allows clients to customize their Portfolios by excluding certain holdings or industries that don't align with their personal preferences. Additionally, this strategy allows for tax-loss harvesting with the ability to manage gains and losses at the individual holding level. Tax-loss harvesting involves certain risks including unintended tax implications. Each Personalized Indexing strategy has their own set of risks based on Client strategy selection and customization.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. The material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Advisor's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed-income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Exchange-Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Advisor has no control over the risks taken by the underlying funds in which clients invest.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Mutual Funds: When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

MW utilizes mutual funds issued by Dimensional Fund Advisors ("DFA"). DFA funds are generally only available through registered investment advisers approved by DFA. Thus, if the Client was to terminate MW's services, and transition to another adviser who has not been approved by DFA to utilize DFA funds, restrictions regarding additional purchases of, or reallocation among other DFA funds, will generally apply.

Investment Companies Risk. When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Digital Asset (Cryptocurrency) investments may lose all value and may be subject to legislative and regulatory changes or actions at the state, federal, or international level which may adversely affect the use, transfer,

exchange, and value of digital/crypto assets. Investing in digital assets is not suitable or recommended for every investor and should only be done by sophisticated investors who are familiar with the unique risks and volatility of these investments. There is currently only limited investment history on digital assets which may lead to heightened volatility based on many economical, social, and legislative factors that influence the price of these investments on a regular basis. Fees and expenses associated with trading digital assets may be substantial.

Investors should conduct extensive research into the legitimacy of each individual digital asset and exchange before investing. The features, functions, characteristics, operation, use and other properties of the specific digital asset may be complex, technical, or difficult to understand or evaluate. The digital asset may be vulnerable to attacks on the security, integrity or operation, including attacks using computing power sufficient to overwhelm the normal operation of the digital asset's blockchain or other underlying technology. Some digital asset transactions will be deemed to be made when recorded on a public ledger, which is not necessarily the date or time that a transaction may have been initiated. Under certain market conditions, investors may find it difficult or impossible to liquidate a position quickly at a reasonable price. This can occur, for example, when the market for a particular digital asset suddenly drops, or if trading is halted due to recent news events, unusual trading activity, or changes in the underlying digital asset system.

Though MW's primary investment strategy is passive investment management, MW and its representative may from time to time recommend less traditional assets (sometimes called "alternative investments") in combination with more traditional assets like stocks and bonds, when suitable. Alternative investments can include: private equity, REITS, DSTs, among others. Alternative investments may be accessed in multiple ways, including, but not limited to, Direct Investment, Pooled Investment Vehicles, and Private Investment Funds.

Alternative investments generally involve various risk factors, including, but not limited to the following. A more in-depth discussion of risks that must be considered is set forth in each investment's offering documents or similar disclosure document, which will be provided to each Client for review and consideration prior to investing.

- Potential for complete loss of principal, meaning that you may lose your entire investment
- Liquidity constraints
- Lack of transparency
- Difficulty obtaining price evaluation
- Limited or no secondary market
- Long term investment commitment
- Volatility of returns
- High internal and operating costs
- Restrictions on withdrawals
- Complex tax structures and delays in tax reporting
- Less regulation

Item 9: Disciplinary Information

Criminal or Civil Actions

MW and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

MW and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

MW and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of MW or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No MW employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No MW employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

MW does not have any related parties. MW only receives compensation directly from clients. We do not receive compensation from any outside source.

MW recommends Clients to Money Managers to manage their accounts. In the event that we recommend a Money Manager, we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5 of this brochure). In addition, clients will receive a copy of the Money Manager's Form ADV 2A, Firm Brochure, which also describes the Money Manager's fee. You are not obligated, contractually or otherwise, to use the services of any Money Manager we recommend. Moreover, MW will only recommend Money Managers who are properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This Code of Ethics does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflicts of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated person's conduct in all matters shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its access persons, or any related person is authorized to recommend to a client or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons’ transactions in specific reportable securities. Any exceptions

or trading pre-clearance must be approved by MW's Chief Compliance Officer in advance of the transaction in an account. MW maintains a copy of access persons' personal securities transactions as required.

Trading Securities At/Around the Same Time as Client's Securities

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for clients' account(s). To address this conflict, our Code of Ethics requires that we purchase or sell securities for our clients' accounts, if suitable and appropriate, before purchasing or selling any of the same securities for any accounts owned by us or our access persons. The only exception to this policy is where our firm or its access persons' transactions are bundled in an aggregate ("block") trade simultaneously with client accounts. This policy is not applicable to securities where no conflict of interest exists, such as shares of mutual funds that are equally priced daily.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

MW does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a client. However, as a result of being on their institutional platform, certain custodians may provide us with certain services that may benefit us. A list of the custodians we recommend and the benefits we receive are provided below.

Charles Schwab & Co., Inc. ("Schwab")

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its

personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to clients, Advisor at all times must put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. **Services that benefit you.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

2. **Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
    - provide access to client account data (such as duplicate trade confirmations and account statements)
    - facilitate trade execution and allocate aggregated trade orders for multiple client accounts
    - provide pricing and other market data
    - facilitate payment of our fees from our clients' accounts
    - assist with back-office functions, recordkeeping, and client reporting

3. **Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
    - Educational conferences and events
    - Consulting on technology, compliance, legal, and business needs
    - Publications and conferences on practice management and business succession

4. **Your brokerage and custody costs.** For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

Altruist Financial LLC ("Altruist")

MW offers investment advisory services through the custodial platform offered by Altruist Financial LLC, an unaffiliated SEC-registered broker-dealer and FINRA/SIPC member ("Altruist"). MW's clients establish brokerage accounts through Altruist. MW maintains an institutional relationship with Altruist whereby Altruist provides certain benefits to MW, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit MW and its clients.

Flourish Cash

We may recommend clients use Flourish Cash, a service offered by Flourish Financial LLC, a registered broker-dealer and FINRA member. Flourish Financial LLC is not a bank. Flourish Cash is an online high-yield savings account that allows clients to receive generally higher interest rates on their cash. MW and Flourish do not have any fee arrangement nor benefit to recommending Flourish as a service. If we recommend Flourish as a service, it's due to its highly competitive interest rates, FDIC protection, user-friendly digital presence, and other factors. MW does not receive any research or other soft-dollar benefit by nature from its relationship with Flourish Cash, nor does MW receive any referrals in exchange for recommending or using Flourish Cash.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a Custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve the most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportional to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

Periodic Reviews

Levi Sanchez, CCO, Jamieson Hopp, Financial Planner, and Riley Poppy, Financial Planner will work with clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. MW does not provide specific reports to clients, other than financial plans. Clients who engage us for investment management services will have their account(s) reviewed regularly on a semi-annual basis by Levi Sanchez, CCO, Jamieson Hopp, Financial Planner, and Riley Poppy, Financial Planner. The account(s) are reviewed with regards to the client's investment policies and risk tolerance levels.

Triggers of Reviews

Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Review Reports

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

MW does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian.

Item 14: Client Referrals and Other Compensation

Compensation Received by Millennial Wealth LLC

MW is a fee-only firm that is compensated solely by its clients. MW does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients.

Client Referrals from Solicitors

MW does not, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Client assets are held at a third party unrelated broker-dealer/custodian. MW does not hold Client assets.

Advisor is deemed to have custody due to our ability to directly deduct our advisory fees and to disburse or transfer certain client funds pursuant to Standing Letters of Authorization ("SLOAs") executed at the option of the client. Where a client has elected to execute a SLOA, MW follows the guidance and additional safeguards set forth in the SEC's no-action letter to the Investment Advisers Association dated February 21, 2017. A copy of that no-action letter can be viewed at the following link:

www.sec.gov/divisions/investment/noaction/2017/investment-adviser-association-022117-206-4.htm.

In addition, MW accepts custody of certain client funds or securities as a result of having access to client's employee stock plan(s) and/or Employer-sponsored plan(s) such as HSAs, 403(b), 401(k), 457(b), DCPs, etc. Our access allows us to implement trades on a discretionary basis in line with the client's agreed-upon portfolio strategy. As an adviser with custody, MW is subject to an annual surprise custody examination by an independent public accountant that is registered with and subject to regular inspection by the Public Companies Accounting Oversight Board (PCAOB). All client funds are held at a qualified custodian and clients will receive statements from that qualified custodian at least quarterly.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For those client accounts where we provide Investment Management Services, MW has discretionary authority and limited power of attorney to determine the securities and the amount of securities to be bought or sold for a client's account without having to obtain prior client approval for each transaction. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account(s). Additionally, the discretionary relationship will be outlined in the Advisory Contract and signed by the client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

If MW has engaged a Money Manager to assist with the management of Client's portfolio, MW has the discretion to direct the Money Manager to buy or sell securities for Client's portfolio without obtaining prior Client approval for each transaction.

Item 17: Voting Client Securities

We do not vote client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than $1,200 in fees six months or more in advance.