

# Item 1: Cover Page



## Millennial Wealth LLC

500 Yale Ave N  
Seattle, WA 98109

<https://millennialwealthllc.com/>

### **Form ADV Part 2A – Firm Brochure**

(206) 207-8426

Dated: January 7th, 2020

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 with the State of Washington . 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](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 289970.

## Item 2: Material Changes

This is an amended Form ADV Part 2A for MW. Material changes include:

Item 5: Adviser increased the hourly rate from \$200 to \$275. Personal Tax Return Preparation was added as an additional service for clients on an opt-in basis.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of MW.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 289970.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (206) 207-8426 or by emailing our Chief Compliance Officer, Levi Sanchez, at [levi@millennialwealthllc.com](mailto:levi@millennialwealthllc.com).

# Item 3: Table of Contents

## Contents

<b>Item 1: Cover Page</b>	<b>1</b>
<b>Item 2: Material Changes</b>	<b>2</b>
<b>Item 4: Advisory Business</b>	<b>4</b>
<b>Item 5: Fees and Compensation</b>	<b>8</b>
<b>Item 6: Performance-Based Fees and Side-By-Side Management</b>	<b>10</b>
<b>Item 7: Types of Clients</b>	<b>11</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>11</b>
<b>Item 9: Disciplinary Information</b>	<b>13</b>
<b>Item 10: Other Financial Industry Activities and Affiliations</b>	<b>13</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>14</b>
<b>Item 12: Brokerage Practices</b>	<b>15</b>
<b>Item 13: Review of Accounts</b>	<b>16</b>
<b>Item 14: Client Referrals and Other Compensation</b>	<b>17</b>
<b>Item 15: Custody</b>	<b>17</b>
<b>Item 16: Investment Discretion</b>	<b>17</b>
<b>Item 17: Voting Client Securities</b>	<b>18</b>
<b>Item 18: Financial Information</b>	<b>18</b>
<b>Item 19: Requirements for State-Registered Advisers</b>	<b>19</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>22</b>

# Item 4: Advisory Business

## Description of Advisory Firm

Millennial Wealth LLC is registered as an Investment Adviser with the State of Washington. We were founded in 2017. Levi Sanchez is the sole Owner of MW. MW currently reports \$22,300,000 in discretionary Assets Under Management as of December 31, 2019.

## Types of Advisory Services

### Investment Management Services

We are in the business of managing investment portfolios. 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 target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may 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 tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

### Financial Planning

We provide financial planning services on topics such as, but not limited to retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

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

- **Cash Flow and Debt Management:** We will 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. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. 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 or the best way to contribute to grandchildren (if appropriate).
- **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.

- **Financial Goals:** We will help clients identify 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:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **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.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning 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 recommend that you 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. We will participate in meetings or phone calls between you and your tax professional with your approval.

- **Personal Tax Return Preparation:** We provide tax preparation services for our clients to assist with the filing of federal and state tax returns for individuals and businesses. We may ask for an explanation or clarification of some items, but we will not audit or otherwise verify client data. The client is responsible for the completeness and accuracy of information used to prepare the returns. Our responsibility is to prepare the returns in accordance with applicable tax laws. We will utilize the services of a third-party accounting, bookkeeping, and tax preparation firm to facilitate the preparation and filing of your tax return and we will work with you and the third party in order to gather the necessary information as part of this service. We may observe opportunities for tax savings that require planning or changes in the way the client handles some transactions. While an engagement for tax return preparation does not include significant tax planning services, we will share any ideas we have with you and discuss terms for any additional work that may be required to implement those ideas.

### **“WealthBase” Financial Planning Package**

This service is tailored to individuals who do not meet our AUM minimum, but wish to receive guidance on with their finances and help articulating short and long-term goals. This service involves identifying the client's objectives and creating clear goals around all financial aspects of their life through the financial planning process and culmination in a comprehensive financial plan. The client is able to communicate with MW Advisors on an ongoing basis via meetings, email and phone calls. At a minimum annually, the advisor will meet with the client for a detailed review and update on the client's goals and objectives. Additional meetings may be scheduled as needed depending on the client's individual needs and situation or as requested by the client. The planner will

monitor the plan, recommend appropriate changes and ensure the plan is up to date. This service is based on an hourly rate of \$275 an hour. Prior to entering into an agreement with the firm the client receives an estimate of the overall cost based on requirements and the time involved. Our published fees may be discounted at the discretion of the firm. We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered for our clients.

#### **“WealthPlus” Financial Planning Package**

This service is tailored for individuals with at least \$180,000 in investable assets. This service is tailored to individuals who do not meet our AUM minimum, but wish to receive guidance with their finances and help articulating short and long-term goals. This service involves identifying the client's objectives and creating clear goals around all financial aspects of their life through the financial planning process and culmination in a comprehensive financial plan. The client is able to communicate with MW Advisors on an ongoing basis via meetings, email and phone calls. At a minimum annually, the advisor will meet with the client for a detailed review and update on the client's goals and objectives. Additional meetings may be scheduled as needed depending on the client's individual needs and situation or as requested by the client. The planner will monitor the plan, recommend appropriate changes and ensure the plan is up to date.

For both financial planning packages:

Clients are required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. Typically, quarterly meetings will be scheduled throughout the course of the year based on the needs of the client to review specific financial planning topics and investment related items unless otherwise indicated by the client.

#### **Client Tailored Services and Client Imposed Restrictions**

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (approximate investable assets, tax rate, risk tolerance, time horizon, etc) and is used to construct a client specific plan to aid in the selection of a portfolio.

#### **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **Item 5: Fees and Compensation**

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fee and without penalty. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## Investment Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value (AUM)	Annual Advisory Fee
\$0 - \$1,000,000	1.0%
\$1,000,000 and Above	Negotiable

The annual fees are negotiable and are prorated and paid in arrears on a monthly basis. The advisory fee percentage of assets under management (AUM) with the advisor. The fee is applied to the account value as of the last day of the previous month. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts, or the client may choose to pay by check. Accounts initiated or terminated during a calendar quarter may be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Pursuant to Securities Act Policy Statement – 21, when the adviser charges an advisory fee, the adviser will provide advisory clients with written billing information which will contain the fee(s), the formula used to calculate the fee(s), and the time period covered by the fee(s). This written billing information will be delivered to the client each time the investment adviser charges a fee. Adviser will not, at any time, be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of the client except as permitted under WAC 460-24A-150.

## “WealthBase” Financial Planning Package

The “WealthBase” Financial Planning Package is based on an hourly rate of \$275 an hour for financial planning and investment advisory services. Prior to entering into our agreement, you’d have received a proposal of estimated total costs based on your requirements and the time involved. If the time spent on services is less than quoted in the proposal, clients will be refunded the difference. This includes, but not limited to the following services:

- Discretionary investment management with no advisory fee for assets under management.
- An in-depth financial planning process that involves:
  - Establishing and defining the client and planner relationship.
  - Gathering data and helping client articulate goals.
  - Analyzing and evaluating the client’s financial status.
  - Developing and presenting the financial plan recommendations.
  - Implementing the financial planning recommendations.
  - Monitoring and making adjustments as necessary.
- At a minimum, quarterly meetings via in person meetings or video conferences.
- Unlimited access to MW advisors via email and phone.



The ongoing financial planning process will involve developing, implementing, and monitoring a plan, throughout the year, around many areas depending on the client's situation. These areas may include but are not limited to:

- Cash flow management
- College Planning
- Student Loan Analysis
- Employee benefits optimization
- Estate planning
- Insurance review
- Risk management
- Tax planning strategies
- Retirement planning

These services are included on an ongoing basis, and covered at a minimum in semi-annual meetings. Implementation of recommended actions are frequently communicated with the client and monitored. This planning package is primarily for clients who wish to build a financial plan, but have little assets to currently work with. In most cases, their incomes can afford our service and they have enough discretionary income to begin accumulating wealth. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Since the monthly fees are paid in arrears, no rebate will be issued upon termination, after the initial plan has been delivered. There's a potential that fees for this service may be higher than the industry average and similar services may be offered at a lower fee from other sources.

### **“WealthPlus” Financial Planning Package**

The “WealthPlus” Financial Planning Package consists solely of an assets under management fee of 1.0% as listed in section above. This includes the following services, but not limited to:

- Discretionary investment management.
- An in-depth financial planning process that involves:
  - Establishing and defining the client and planner relationship.
  - Gathering data and helping client articulate goals.
  - Analyzing and evaluating the client's financial status.
  - Developing and presenting the financial plan recommendations.
  - Implementing the financial planning recommendations.
  - Monitoring and making adjustments as necessary.
- At a minimum, quarterly meetings via in person meetings or video conferences.
- Unlimited access to MW advisors via email and phone.

The ongoing financial planning process will involve developing, implementing, and monitoring a plan, throughout the year, around many areas depending on the client's situation. These areas may include but are not limited to:

- Cash flow management
- College Planning
- Student Loan Analysis
- Employee benefits optimization

- Estate planning
- Insurance review
- Risk management
- Tax planning strategies
- Retirement planning

These services are included on an ongoing basis, and covered at a minimum in semi-annual meetings. Implementation of recommended actions are frequently communicated with the client and monitored. This planning package is for clients with a significant amount of assets. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Since the monthly fees are paid in arrears, no rebate will be issued upon termination, after the initial plan has been delivered. There's a potential fees for this service may be higher than the industry average and similar services may be offered at a lower fee from other sources.

### **Personal Tax Return Preparation**

The fees for Personal Tax Return Preparation will be determined based on the complexity of the return and quality of recordkeeping. The fees may be negotiable in certain cases, will be agreed upon at the start of the engagement, and are due at the completion of the engagement. Clients are not required to utilize any third-party products or services that we may recommend and they can receive similar services from other professionals at a similar or lower cost.

### **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.

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).

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.

## Item 7: Types of Clients

We provide financial planning and portfolio management services to young professionals and technology industry employees.

We have a minimum account size requirement of \$180,000 for our WealthPlus Financial Planning Package. We do not have a minimum account size requirement for our WealthBase Package.

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

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment analysis are fundamental, cyclical, and charting analysis.

**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.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

### Use Of Outside Managers

We refer clients to third-party investment advisers ("outside managers"). Our analysis of outside managers involve the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the 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 manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that

success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a 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 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.

## **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. 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 Adviser'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.

**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 marketwide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client’s invest.

**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).

## 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 have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No MW employee is registered, or have 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. As a result, we do not have a relationship with any related parties.

MW only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Levi Sanchez is not licensed to sell life and health insurance and does not sell insurance products to clients or prospective clients of the firm.

# 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 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 of 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 associates 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, etc.

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

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or

personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation

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

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 5 days prior to the same security for clients.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker-Dealers**

Millennial Wealth LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

#### **1. Research and Other Soft-Dollar Benefits**

We currently do not receive any soft dollar benefits.

#### **2. 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.

#### **3. 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 most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

### **The Custodian and Brokers We Use (TD Ameritrade)**

MW participates in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between MW's participation in the program and the investment advice it gives to its clients, although MW receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving MW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to MW by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by MW's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit MW but may not benefit its client accounts. These products

or services may assist MW in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help MW manage and further develop its business enterprise. The benefits received by MW or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, MW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by MW or its related persons in and of itself creates a potential conflict of interest and may indirectly influence MW's choice of TD Ameritrade for custody and brokerage services.

### **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

Client accounts with discretionary assets under management will be reviewed regularly on a monthly basis by Levi Sanchez, Owner and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive drawdown, volatility in performance, or buy and sell decisions from the firm or per client's needs.

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

MW will not provide written reports to Investment Management clients. We may provide written reports to clients as needed, and will provide a comprehensive financial plan to clients participating in either package offerings. However, we will not provide separate reports for investment accounts other than the client's monthly statement delivered by the custodian.

## Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.



We receive a non-economic benefit from TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of TD Ameritrade’s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## Item 15: Custody

MW does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which MW directly debits their advisory fee:

- i. MW will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least monthly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to MW, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least monthly 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, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. 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. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

## 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

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months or more in advance.

# Item 19: Requirements for State-Registered Advisers

## Levi Sanchez

Born: 1991

### Educational Background

- 2014 - Management Information Systems, Washington State University
- 2010 - High School Diploma, Hanford High School

### Business Experience

- 07/2017 – Present, Millennial Wealth LLC, Owner
- 05/2014 - 05/2017, Merrill Lynch, Financial Advisor
- 08/2013 - 05/2014, Washington State University, Student
- 05/2013 - 08/2013, Study Abroad, Student
- 08/2012 - 05/2013, Washington State University, Student
- 05/2012 - 08/2012, Department of Energy, Intern
- 08/2010 - 05/2012, Washington State University, Education
- 05/2010 - 08/2010, Douglas Fruit Co, Repack Assistant

### Professional Designations, Licensing & Exams

**CERTIFIED FINANCIAL PLANNER® - CFP EXAM**

**BEHAVIORAL FINANCIAL ADVISOR™ - BFA EXAM**

### Other Business Activities

Levi Sanchez is not involved in any outside business activities.

### Performance Based Fees

MW is not compensated by performance-based fees.

### Material Disciplinary Disclosures

No management person at Millennial Wealth LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### Material Relationships That Management Persons Have With Issuers of Securities

Millennial Wealth LLC, nor Levi Sanchez, have any relationship or arrangement with issuers of securities.

### Additional Compensation

Levi Sanchez does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through MW.

### **Supervision**

Levi Sanchez, as Owner and Chief Compliance Officer is responsible for the supervision of the actions of Levi Sanchez. He may be contacted at the phone number on this brochure supplement.

### **Requirements for State Registered Advisers**

Levi Sanchez, has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

# Millennial Wealth LLC

500 Yale Ave N  
Seattle, WA 98109  
(206) 207-8426

Dated January 2nd, 2020

## Form ADV Part 2B – Brochure Supplement

*For*

### **Levi Sanchez - Individual CRD# 6342619**

#### Owner & Investment Adviser Representative

This brochure supplement provides information about Levi Sanchez that supplements the Millennial Wealth LLC (“MW”) brochure. A copy of that brochure precedes this supplement. Please contact Levi Sanchez if the MW brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Levi Sanchez is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6342619.

## Item 2: Educational Background and Business Experience

### **Levi Sanchez**

Born: 1991

#### **Educational Background**

- 2014 - Management Information Systems, Washington State University
- 2010 - High School Diploma, Hanford High School

#### **Business Experience**

- 09/2017 – Present, Millennial Wealth LLC, Owner
- 05/2014 - 05/2017, Merrill Lynch, Financial Advisor
- 08/2013 - 05/2014, Washington State University, Student
- 05/2013 - 08/2013, Study Abroad, Student

- 08/2012 - 05/2013, Washington State University, Student
- 05/2012 - 08/2012, Department of Energy, Intern
- 08/2010 - 05/2012, Washington State University, Education
- 05/2010 - 08/2010, Douglas Fruit Co, Repack Assistant

### **Professional Designations, Licensing & Exams**

**CERTIFIED FINANCIAL PLANNER® - CFP EXAM**

**BEHAVIORAL FINANCIAL ADVISOR™ - BFA EXAM**

## Item 3: Disciplinary Information

No management person at Millennial Wealth LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Levi Sanchez is not involved in any outside business activities.

## Item 5: Additional Compensation

Levi Sanchez does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through MW.

## Item 6: Supervision

Levi Sanchez, as Owner and chief compliance officer is responsible for the supervision of the actions of Levi Sanchez. He may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Levi Sanchez has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.